

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINJAN SOFTWARE, LTD., an Israel corporation,

Plaintiff-Counterdefendant,

V.

SECURE COMPUTING CORPORATION,
a Delaware corporation, CYBERGUARD,
CORPORATION, a Delaware corporation,
WEBWASHER AG, a German corporation
and DOES 1 THROUGH 100,

Defendants-Counterclaimants.

C. A. No. 06-369-GMS

JOINT PROPOSED FINAL PRETRIAL ORDER

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Dated: January 7, 2008

OF COUNSEL:

Ronald J. Schutz
Jake M. Holdreith
Christopher A. Seidl
Trevor J. Foster
Robins, Kaplan, Miller & Ciresi L.L.P.
3800 LaSalle Plaza
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Minneapolis, MN 55402
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This matter having come before the Court at a pretrial conference held on February 6, 2008, pursuant to Fed. R. Civ. P. ("Rule") 16, and Paul Andre and Lisa Kobialka of the law firm of Perkins Coie LLP, 101 Jefferson Drive, Menlo Park CA 94025, Phone Number (650) 838-4300, and Philip A. Rovner of Potter Anderson & Corroon LLP, P.O. Box 951, 1313 N. Market Street, Wilmington, DE 19801, Phone Number (302) 984-6000, having appeared as counsel for Plaintiff-Counterdefendant, Finjan Software, Ltd. and Counterdefendant Finjan Software, Inc. ("Finjan"), and Ron Schutz and Jake Holdreith of the law firm of Robins, Kaplan, Miller & Ciresi L.L.P., 2800 LaSalle Plaza, 800 LaSalle Avenue, Minneapolis, Minnesota 55402, Phone Number (612) 349-8500, and Frederick L. Cottrell, III of the law firm of Richards Layton & Finger, One Rodney Square, P.O. Box 551, Wilmington, DE 19899, Phone Number (302) 651-7700, having appeared as counsel for Defendants-Counterclaimants, Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG ("Secure Computing"), the following actions were taken:

- (1) This is an action for patent infringement. The jurisdiction of the Court is involved under 28 U.S.C. §§ 1331 and 1338, and under the Federal Declaratory Judgment Act, Title 28, sections 2201 and 2202. Jurisdiction is not disputed.
- (2) The following stipulations and statements were submitted and are attached to and made a part of this Order:¹
 - a. Attached as Schedule A is a comprehensive stipulation of all uncontested facts, which will become part of the evidentiary record in this case, and may be read to the jury by the Court or any party.

¹ Unless expressly modified in the body of this Order, the footnotes from the Court's Form Pre-Trial Order (located at http://www.ded.uscourts.gov/GMS/Forms/Final_Pretial_Order.pdf) are incorporated herein by reference.

- b. Attached as Schedule B is a statement of contested issues of fact and law.
- c. Attached as Schedule C are:
 - i. Three separate exhibits lists: (1) Joint Exhibit List agreed to by the parties; (2) Finjan's Exhibits List; and (3) Secure Computing's Exhibit List. These three lists contain all exhibits, except rebuttal and demonstrative exhibits, that may be offered as evidence at trial. The descriptions of the exhibits in these lists are for identification purposes only and the parties are not agreeing that the descriptions accurately characterize the documents. The descriptions are not admissions as to the content, admissibility or relevance of the documents. The parties reserve the right to offer rebuttal exhibits that are not set forth on their exhibit lists for impeachment purposes or for rebuttal. The parties reserve the right to offer exhibits listed on the opposing party's exhibit list. The parties have further agreed to work together regarding exhibit lists in the event exhibits need to be added or removed, as appropriate.²
 - ii. Demonstrative exhibits are not included on these lists. The parties agree to exchange a color copy of any demonstrative at least 24 hours before the morning of the day the demonstrative is expected to be used in Court. The parties agree further to meet and confer regarding any demonstrative in an effort to resolve any possible disputes or objections regarding the demonstrative prior to its expected use in Court.

² The parties agree to provide to the opposing party a binder containing the trial exhibits and color representations of the demonstratives to be used during the direct examination of that specific witness prior to that witness' testimony.

- d. Attached as Schedule D is a witness list of the names and addresses of the potential witnesses to be called by each party, with a statement of any objections to calling, or to the qualifications of, any witness identified on the list. Objections to testimony of witnesses offered by deposition are listed in the parties' deposition designations. Each party will provide to the opposing party a written list of witnesses that it intends to call to testify either live or by designation by end of the last day before the morning of the day the witness is expected to testify or 24 hours in advance of Mondays.
- e. Attached as Schedule E are Finjan's and Secure Computing's statements of the qualifications of the parties' respective expert witnesses and summaries of the subject matter of their testimony, where appropriate. Secure Computing objects to Finjan's Schedule E. Secure Computing contends that Finjan's Schedule E goes beyond the scope of qualifications, improperly characterizes technology, and would be prejudicial to Secure Computing if read to the jury. If Finjan's Schedule E will be read to the jury, Secure Computing requests that it be allowed to supplement its Schedule E with additional statements regarding its experts to balance the parties' statements.
- f. Attached as Schedule F is a list of all depositions, or portions thereof, that may be offered into evidence by Finjan and Secure Computing, respectively, as well as statement of the parties' respective objections thereto, exclusive of deposition testimony that may be used during cross examination of live witnesses. The parties have agreed that they may rely on each other's deposition designations.

g. Statement of Special Damages:

- i. Finjan intends to seek attorney's fees pursuant to 35 U.S.C. §285.
 - ii. Secure Computing may seek attorney's fee pursuant to 35 U.S.C. §285.
- h. There have been no waivers of any claims or defenses that have been abandoned by Finjan or Secure Computing.
- i. The parties will have submitted the following papers on January 7, 2008:
 - i. trial briefs;
 - ii. proposed jury instructions, in triplicate and on diskette;
 - iii. special verdict forms in triplicate and on diskette; and
 - iv. voir dire questions, in triplicate and on diskette.
- j. Attached as Schedule G is a statement summarizing the history and status of settlement negotiations, indicating whether further negotiations are ongoing and likely to be productive.
- k. Discovery is completed.
- l. Pursuant to the Court's Scheduling Order in this matter, the parties will have filed motions *in limine*, together with briefs in support, in opposition and reply, on January 7, 2008. A list of the motions in limine is attached as Schedule H. No party shall file more than five (5) motions in limine without prior approval of the court. Opening and answering briefs shall not exceed five (5) pages and reply briefs shall not exceed three (3) pages.

- (3) Trial of this case is currently set for seven (7) days beginning at 9:00 a.m. on March 3, 2008.
- (4) Type of trial: Jury.
- (5) Finjan requests that 6 jurors plus 2 alternates be selected at the commencement of trial. Secure Computing requests that 8 jurors plus 2 alternates be selected at the commencement of trial. If for some reason one or more jurors are excused before a verdict is received, Secure Computing requests that a minimum of 7 jurors be required to deliberate to verdict.
- (6) This Order will control the course of the trial and may not be amended except by consent of the parties and the Court, or by Order of the Court to prevent manifest injustice.
- (7) Possibility of settlement of this case was considered by the parties.

POTTER ANDERSON & CORROON LLP

RICHARDS, LAYTON & FINGER

By: /s/ Philip A. Rovner

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Attorneys for Defendants

OF COUNSEL:

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(650) 838-4300

Dated: January 7, 2008

OF COUNSEL:

Ronald J. Schutz
Jake M. Holdreith
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Trevor J. Foster
Robins, Kaplan, Miller & Ciresi L.L.P.
3800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402
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Date: _____

Chief Judge Gregory M. Sleet

841133

EXHIBIT A

SCHEDULE A

Stipulation of Uncontested Facts

Finjan Software, Ltd., Finjan Software, Inc. (collectively “Finjan”) and Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG (“Secure Computing”) stipulate to the following uncontested facts, which will become a part of the evidentiary record in this case, and which may be read to the jury by the Court or any party:

1. Finjan Software, Ltd. is a corporation organized and existing under the laws of Israel, with its principal place of business at Hamachshev St. 1, New Industrial Area, Netanya, 42504, Israel.
2. Finjan Software, Inc. is a corporation organized and existing under the laws of Delaware, with its principal place of business at 2025 Gateway Place, San Jose, California, 95110.
3. Secure Computing Corporation is a corporation organized and existing under the laws of the State of Delaware, with its corporate headquarters at 4810 Harwood Road, San Jose, California, 95124. Secure Computing Corporation is in the business of developing and distributing network and systems security solutions to organizations.
4. Webwasher AG was a corporation organized and existing under the laws of Germany. Webwasher AG was acquired by Cyberguard Corporation in April 2004.
5. Cyberguard Corporation was a corporation organized and existing under the laws of the State of Delaware. In January 2006, Cyberguard Corporation, and its then subsidiary Webwasher AG, was merged into Secure Computing Corporation.
6. United States Provisional Patent Application No. 60/030,639 was filed on November 8, 1996.
7. United States Patent Application No. 08/964,388 was filed on November 6, 1997 and issued as United States Patent No. 6,092,194 on July 18, 2000.
8. United States Patent Application No. 09/539,667 is a continuation of United States

Patent Application No. 08/964,639.

9. United States Patent Application No. 09/539,667 was filed on March 30, 2000 and issued as United States Patent No. 6,804,780 on October 12, 2004.
10. United States Patent Application No. 09/861,229 is a continuation in part of United States Patent Application No. 09/539,667.
11. United States Patent Application No. 09/861,229 was filed on May 17, 2001 and issued as United States Patent No. 7,058,822.
12. Finjan Software, Ltd. is the assignee of United States Patent Nos. 6,092,194, 6,804,780, and 7,058,822.
13. United States Patent Application No. 09/024,576 was filed on February 17, 1998 and issued as United States Patent No. 6,357,010 on March 12, 2002.
14. United States Patent Application No. 09/495,157 was filed on January 31, 2000 and issued as United States Patent No. 7,185,361 on February 27, 2007.
15. Secure Computing is the assignee of United States Patent No. 6,357,010 and United States Patent No. 7,185,361.

EXHIBIT B

SCHEDULE B

Stipulation of Contested Issues of Fact and/or Law

Finjan Software Ltd., Finjan Software, Inc. (collectively “Finjan”) and Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG (“Secure Computing”) agree to the following statement of contested issues:

1. Whether Secure Computing literally infringes, or in the alternative infringes under the Doctrine of Equivalence,¹ claims 1-14, 24-30, 32-36 and 65 of United States Patent No. 6,092,194 by making, using, selling, offering to sell and importing the Webwasher and Cyberguard TSP products in violation of 35 U.S.C. § 271(a).
2. Whether United States Patent No. 6,092,194 is not infringed by Secure Computing.
3. Whether claims 1-14, 24-30, 32-36 and 65 of United States Patent No. 6,092,194 are invalid for anticipation under 35 U.S.C. § 102(a) and/or § 102(b), or obviousness under 35 U.S.C. § 103.
4. Whether United States Patent No. 6,092,194 is invalid for lack of enablement, indefiniteness, and inadequate written description under 35 U.S.C. § 112.
5. Whether United States Patent No. 6,092,194 is unenforceable due to inequitable conduct by Finjan Software, Ltd. under 37 C.F.R. § 1.27 and 37 C.F.R. § 1.56.
6. Whether Secure Computing literally infringes, or in the alternative infringes under the Doctrine of Equivalence,² claims 1-18 of United States Patent No. 6,804,780 by making, using, selling, offering to sell and importing the Webwasher and Cyberguard TSP products in violation of 35 U.S.C. § 271(a).
7. Whether United States Patent No. 6,804,780 is not infringed by Secure Computing.
8. Whether claims 1-18 of United States Patent No. 6,804,780 are invalid for anticipation

¹ Subject to Secure Computing’s Motion in Limine.

² Subject to Secure Computing’s Motion in Limine.

- under 35 U.S.C. § 102(a) and/or § 102(b), or obviousness under 35 U.S.C. § 103.
9. Whether United States Patent No. 6,804,780 is invalid for lack of enablement, indefiniteness, and inadequate written description under 35 U.S.C. § 112.
 10. Whether United States Patent No. 6,804,780 is unenforceable due to inequitable conduct by Finjan Software, Ltd. under 37 C.F.R. § 1.27.
 11. Whether Secure Computing literally infringes, or in the alternative infringes under the Doctrine of Equivalence,³ claims 1, 2, 4, 6, 8, 9, 12, 13, 15-18, 20-22, 24, 26-29, 31, 32, 34 and 35 of United States Patent No. 7,058,822 making, using, selling, offering to sell and importing the Webwasher and Cyberguard TSP products in violation of 35 U.S.C. § 271(a).
 12. Whether United States Patent No. 7,058,822 is not infringed by Secure Computing.
 13. Whether claims 1, 2, 4, 6, 8, 9, 12, 13, 15-18, 20-22, 24, 26-29, 31, 32, 34 and 35 of United States Patent No. 7,058,822 are invalid for anticipation under 35 U.S.C. § 102(a) and/or § 102(b), or obviousness under 35 U.S.C. § 103.
 14. Whether United States Patent No. 7,058,822 is invalid for lack of enablement, indefiniteness, and inadequate written description under 35 U.S.C. § 112.
 15. Whether any of the asserted claims of United States Patent Nos. 6,092,194 and 6,804,780 are entitled to the benefit of the filing date of United States Provisional Patent Application No. 60/030,639.
 16. Whether any of the asserted claims of United States Patent No. 7,058,822 are entitled to the benefit of the filing date of United States Provisional Patent Application 60/205,591, United States Patent Application No. 09/551,302, or United States Patent Application No. 09/539,667.
 17. The amount of damages adequate to compensate Finjan Software, Ltd. for alleged

³ Subject to Secure Computing's Motion in Limine.

infringement pursuant to 35 U.S.C. § 284.

18. Whether Secure Computing's alleged infringement of any claim of United States Patent Nos. 6,092,194, 6,804,780 and 7,058,822 was or was not willful in violation of 35 U.S.C. §284.
19. Whether this case is exceptional entitling Finjan Software, Ltd. to an award of attorney fees pursuant to 35 U.S.C. § 285.
20. Whether Finjan Software, Ltd. is entitled to a permanent injunction pursuant to 35 U.S.C. § 283.
21. Whether Finjan Software, Ltd.'s claims are barred and/or limited under 28 U.S.C. § 1498.
22. Whether Finjan Software, Ltd.'s claims that Secure Computing is inducing and/or contributorily infringing is barred because the underlying alleged direct infringement is licensed and/or released.
23. Whether Finjan Software, Ltd.'s claims are barred and/or limited by the doctrine of patent exhaustion.
24. Whether Finjan literally infringes, or in the alternative infringes under the Doctrine of Equivalence, claims 1-5, 7-12 and 14-15 of United States Patent No. 7,185,361 by making, using, selling, offering to sell and importing the Vital Security NG and Internet lBox products in violation of 35 U.S.C. § 271(a).
25. Whether United States Patent No. 7,185,361 is not infringed by Finjan.
26. Whether Finjan infringes by inducement or contributory infringement claims 1-5, 7-12 and 14-15 of United States Patent No. 7,185,361 with its Vital Security NG and Internet lBox products.
27. Whether United States Patent No. 7,185,361 is not infringed by Finjan by inducement or contributory infringement.
28. Whether claims 1-5, 7-12 and 14-15 of United States Patent No. 7,185,361 are invalid for anticipation under 35 U.S.C. § 102(a) and/or § 102(b), or obviousness under 35

U.S.C. § 103.

29. Whether Finjan literally infringes, or in the alternative infringes under the Doctrine of Equivalence, claim 37 of United States Patent No. 6,357,010 by making, using, selling, offering to sell and importing the Vital Security™ for Documents (aka Finjan Mirage) product in violation of 35 U.S.C. § 271(a).
30. Whether United States Patent No. 6,357,010 is not infringed by Finjan.
31. Whether Finjan infringes by inducement or contributory infringement claim 37 of United States Patent No. 6,357,010 with its Vital Security™ for Documents (aka Finjan Mirage).
32. Whether United States Patent No. 6,357,010 is not infringed by Finjan by inducement or contributory infringement.
33. Whether claim 37 of United States Patent No. 6,357,010 is invalid for anticipation under 35 U.S.C. § 102(a) and/or § 102(b), or obviousness under 35 U.S.C. § 103.
34. The amount of damages adequate to compensate Secure Computing Corporation for alleged infringement pursuant to 35 U.S.C. § 284.
35. Whether Finjan's alleged infringement of any claim of United States Patent No. 7,185,361 and United States Patent No. 6,357,010 was or was not willful in violation of 35 U.S.C. §284.
36. Whether this case is exceptional entitling Secure Computing Corporation to an award of attorney fees pursuant to 35 U.S.C. § 285.
37. Whether Secure Computing Corporation is entitled to a permanent injunction pursuant to 35 U.S.C. § 283.

EXHIBIT C, PART 1

Schedule C**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

Finjan Software, Ltd. v. Secure Computing Corp., et al.

CASE NO. 1:06-cv-369 GMS

Trial Date: March 3, 2008

JOINT TRIAL EXHIBIT LIST

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Marked	Admitted
JTX-1	Germany Ex. 10	07/18/00	FIN000001-20	U.S. Patent No. 6,092,194			
JTX-2	Germany Ex. 11	10/12/04	FIN014439-56	U.S. Patent No. 6,804,780			
JTX-3	Germany Ex. 13	06/06/06	FIN014734-57	U.S. Patent No. 7,058,822			
JTX-4	Greve Ex. 2 Germany Ex. 14	03/12/02	SC 10694-714	U.S. Patent No. 6,357,010			
JTX-5	Chew Ex. 2 Germany Ex. 12	02/27/07	SC11093-102	U.S. Patent No. 7,185,361			
JTX-6	Putman Ex. 2			Webwasher and Secure Computing billings and sales reports	HC-AEO		
JTX-7		09/30/05	FIN011884-914	Cyberguard Corporation Form 10-Q			
JTX-8		03/01/06	FIN012049-80	Secure Computing Corporation Form S-3			
JTX-9		12/31/05	FIN012081-154	Secure Computing Corporation Form 10-K			

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Marked	Admitted
JTX-10		12/06/05	FIN012155-411	Secure Computing Corporation Form S-4/A			
JTX-11				Secure Computing Corporation Form 10-K (Fiscal year Ending December 31, 2006)			
JTX-12		08/04/04	SC187526-85	Valuation of Certain Intangible Assets Pertaining to the Acquisition of Webwasher AG by Cyberguard Corporation as of April 29, 2004	HC-AEO		
JTX-13		2005	FIN015001-266	Finjan's Vital Security for E-Mail 7.0 Service Pack 3 User Manual	Confidential		
JTX-14		2004	FIN015267-596	Finjan's Vital Security for Web 7.0 Service Pack 3 User Manual	Confidential		
JTX-15	Ben-Itzhak/1001	01/23/06	FIN009696-717	Consolidated Financial Statements; Finjan Software, Inc and Its Subsidiaries as of December 31, 2005			
JTX-16	Polani/2044		FIN009002-03	Financial chart; Finjan Software Inc. - Consolidated Management Reports; Annual Invoiced Sales			
JTX-17	Polani/2045		FIN012994-95	Sales Chart			

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Marked	Admitted
JTX-18	Polani/2046		FIN012992	Financial Spreadsheet			
JTX-19	Polani/2047	00/00/05	FIN018289-303	Financial Statements for the 3 Months Ended June 30, 2005			
JTX-20	Polani/2048	10/27/05	FIN018304-325	Financial Statements for the 3 Months Ended Sep. 30th, 2005			
JTX-21	Polani/2049	00/00/06	FIN018326-343	Financial Statements for the 3 Months Ended Dec. 31, 2005			
JTX-22	Polani/2050	00/00/06	FIN018344-63	Preliminary Financial Statements for the 3 Months Ended March 31, 2006			
JTX-23	Polani/2051	00/00/06	FIN018364-388	Preliminary Financial Statements for the 3 Months Ended June 30, 2006			
JTX-24	Polani/2052	11/29/06	FIN018389-434	Preliminary Financial Statements for the 3 Months Ended September 30, 2006			
JTX-25	Polani/2053	02/21/07	FIN018415-439	Preliminary Financial Statements for the 3 Months Ended December 31, 2006			

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Marked	Admitted
JTX-26	Polani/2054	05/09/07	FIN018440-462	Preliminary Financial Statements for the 3 Months Ended March 31, 2007			
JTX-27	Polani/2055	07/09/07	FIN018267-288	Preliminary Financial Statements for the 3 Months Ended June 30, 2007			
JTX-28	Sofer/1034	06/03/07		Consolidated Financial Statements for Finjan Software, Inc. and its Subsidiaries as of December 31, 2006			
JTX-29	Sofer/1035	02/28/05	FIN009718-38	Consolidated Financial Statements for Finjan Software, Inc. and its Subsidiaries as of December 31, 2004			
JTX-30	Sofer/1036	03/16/04	FIN009739-61	Consolidated Financial Statements for Finjan Software, Inc. and its Subsidiaries as of December 31, 2005			
JTX-31	Sofer/1037		FIN009772-80	Notes to Consolidated Financial Statements (pages 12-20) for Finjan Software and its Subsidiaries			

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Marked	Admitted
JTX-32	Sofer/1038	07/03/02	FIN009781-99	Consolidated Financial Statements for Finjan Software, Inc. and its Subsidiaries as of December 31, 2001			
JTX-33	Sofer/1039	02/15/01	FIN009800-20	Consolidated Financial Statements for Finjan Software, Inc. and its Subsidiaries as of December 31, 2000			
JTX-34	Sofer/1040	06/30/00	FIN009821-36	Consolidated Financial Statements for Finjan Software, Inc. and its Subsidiaries as of December 31, 1999			
JTX-35	Sofer/1041	09/01/99	FIN009837-52	Consolidated Financial Statements for Finjan Software, Inc. as of December 31, 1998			
JTX-36	Sofer/1049		FIN001613	Chart; Finjan - Management Matrix 1997 - Consolidated			
JTX-37	Stecher/1			Handwritten Notes			
JTX-38	Stecher/2	01/12/06		Handwritten Notes			
JTX-39		07/31/07	SC072749-94	Webwasher overview			
JTX-40		12/31/02	FIN009762-80	Consolidated Financial Statements			

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Marked	Admitted
JTX-41		10/01/01	SC024519-40	Bulletin: Worldwide Security 3As Software Market Forecast and Analysis, 2001-2005			
JTX-42		09/13/05	FIN011781-83	Cyberguard Form 10-K			
JTX-43		06/30/05	FIN011915-017	Cyberguard Form 10-K			
JTX-44		12/03/05	FIN012421-98	Secure Computing's Form 10-K			
JTX-45				Secure Computing's 2006 Annual Report			
JTX-46		08/04/06	SC170610-12	Email re Guidelines for Webwasher Support in TSP v6.4			
JTX-47		12/12/07		Exhibit C from the Rebuttal Expert Report of Dan Wallach			
JTX-48		12/12/07		Exhibit D from the Rebuttal Expert Report of Dan Wallach			
JTX-49		12/12/07		Exhibit E from the Rebuttal Expert Report of Dan Wallach			

FINJAN'S PROPOSED TRIAL EXHIBIT LIST AND SECURE COMPUTING'S OBJECTIONS

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections¹	Marked	Admitted
PTX-6	Greve Ex. 3	2005	SC187686-706	Secure Computing Analysis & Estimation for Virus Harvesting & Autorating	HC-AEO ²	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-9	Germany Ex. 4		SC023430-67	Secure Computing Webwasher Proactive Scanning presentation	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 FRE 403 (marginalia on SC 023446) Lack of Foundation Lack of Foundation (marginalia on SC 023446)		

¹ Secure Computing sets forth its objections to Finjan's Proposed Trial Exhibit List by abbreviation. The Reference Key for Secure Computing's Objections to Finjan's Proposed Trial Exhibits is attached hereto at Schedule C(1).

² Documents designated "Highly Confidential – Attorneys' Eyes Only"

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-10	Germany Ex. 5	07/05/04	SC 01360-86	Webwasher white paper entitled "Webwasher Monile Code Filter – Detection and Classification of Malicious Mobile Code"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-11	Germany Ex. 6	2007		Secure Computing white paper entitled "Webwasher Proactive Scanning – Step-By-Step Guide"		FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-12	Germany Ex. 7	2005	SC066232-63	Webwasher white paper entitled "Webwasher Proactive Scanning – Step-By-Step Guide"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-13	Germany Ex. 8	2005	SC071937-67	Webwasher white paper entitled "Webwasher Proactive Scanning – Step-By-Step Guide"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-14	Germany Ex. 9	07/19/06	SC032421-24	Webwasher document entitled "Webwasher Proactive Scanning – Visible new features in release 6.0"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-15	Germany Ex. 15	08/29/07		Drawing by Christoph Alme		FRE 802 FRE 901 FRE 106 (partial document)		
PTX-16	Germany Ex. 16	05/28/04	SC166301-02	Email from Alme to Stecher	HC-AEO	All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-17	Germany Ex. 17	04/14/05	SC166653-59	Email from Alme to checkin	Confidential	All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-18	Germany Ex. 18	12/29/05	SC145290-306	Email from Alme to Stecher & Borgolte	HC-AEO	All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-19	Germany Ex. 19	03/01/05	SC077266-74	Webwasher 5 Training Proactive Security presentation	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-20	Germany Ex. 20	04/04/05	SC02099-163	Webwasher Product Roadmap presentation	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-21	Germany Ex. 21		SC066200-21	Webwasher SCM 6.0 – Anti-Malware presentation	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-22	Germany Ex. 22		SC 03501-628	Webwasher From Secure Computing presentation	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-23	Germany Ex. 23 Gallagher Ex. 14	08/2003	SC072833-68	IDC Market Analysis – Worldwide Antivirus Software Forecast & Analysis 2003-2007	Confidential	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-24	Germany Ex. 24 Gallagher Ex. 15	07/2004	SC023181-231	IDC Market Analysis – Worldwide Secure Content Management 2004-2008	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-25	Germany Ex. 25 Gallagher Ex. 16	09/2005	SC076359-440	IDC Market Analysis – Worldwide Secure Content Management 2006-2009	Confidential	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-26	Germany Ex. 26	09/08/04	SC145463-90	Webwasher white paper entitled “Webwasher CSM Suite: Proactive Security”	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-27	Germany Ex. 27	02/28/05	SC022423-36	Webwasher Anti Spam & Webwasher Anti Virus 5 Head to Head Against Finjan Vital Security for E-mail	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-28	Germany Ex. 28	06/06/05	SC 03318-33	Webwasher URL Filter 5.2 and Webwasher Anti Virus 5.2 Head To Head vs. Finjan Vital Security for Web 8	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-29	Germany Ex. 29	2006	SC011759-62	Secure Computing Web Gateway Security Product Overview	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-30	Germany Ex. 30	08/28/06	SC072063-83	Webwasher 6.0.0 Product Requirements Document	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-31	Germany Ex. 31	09/16/02	SC077630-31	Email from Stecher to Joepen et al.	HC-AEO	All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-32	Germany Ex. 32	05/23/03	SC077723-25	Email from Friedrich to Berzau et al.	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-33	Germany Ex. 33	05/20/03	SC153656-63	Finjan SurfinGate Web 7.0 Competitive Analysis	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-34	Germany Ex. 34	09/16/03	SC077703-05	Product Meeting Minutes	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-35	Germany Ex. 35	04/19/04	SC030765-66	Email from Cuny to Shuman et al.	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-36	Germany Ex. 36	06/18/04	SC166304-18	Email from Joepen to Stecher et al.	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-37	Germany Ex. 37	07/01/04	SC075235-36	Email from Berzau to Friedrich et al.	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-38	Germany Ex. 38		SC155173-81	Proactive Security Patent Lists	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		
PTX-39	Germany Ex. 39		SC077768-69	Martin Stecher email notes	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-40	Germany Ex. 40	03/03/05	SC153611-12	Weekly Status Report / Feb. 28 – Mar. 3, 2005 (Roland Cuny)	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-41	Germany Ex. 41	04/07/06	SC074938-39	Email from Bugreport to Ismer	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-42	Germany Ex. 42	2006	SC067894-905	Secure Computing Overcoming Addiction to Signatures	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-43	Gateway Ex. 43	04/14/05	SC146034-62	Webwasher Quotation – UBS Group Antri Virus Gateway Project	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-44	Germany Ex. 45	09/06/06	SC 01335-40	Email from Peterson to SCC-Global with attachments	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-45	Germany Ex. 46	08/04/06	SC 10247	Email from Monk to Thompson	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-46	Germany Ex. 47		SC020500	Patente (Ablage Vorstand)	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 106 Lack of Foundation		
PTX-47	Germany Ex. 48	01/12/06	SC074980-83	Email from Lamar to Elbaz	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-48	Germany Ex. 49	10/04/04	SC028994-96	Email from Lawson to Joepen	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation FRE 105		
PTX-49	Germany Ex. 50	11/26/04	SC031938-39	Meeting Protocol – Threat Prevention Team	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-50	Germany Ex. 51	10/20/06	SC114086-87	Secure Computing Corporation Q4 2006 Objectives & Key Results	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-51	Germany Ex. 52	06/22/07	SC145492-96	Webwasher - Finjan Vital Security for Web	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-52	Germany Ex. 53	08/04/06	SC029007-08	Email from Borgolte to prodmeeting	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-53	Lally Ex. 2	11/07/06	SC170299-316	Reseller Agreement between ImmixTechnology and Secure Computing Corporation	HC-AEO	No objection.		
PTX-54	Lally Ex. 3	10/24/02	SC170200-12	Cisco AVVID Partner Program Agreement between Cisco Systems, Inc. and webwasher.com, AG	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-55	Lally Ex. 4	08/19/05	SC115251-63	Webwasher 5.2 Pricing Model and Explanations - August 2004	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-56	Lally Ex. 5	01/19/07	SC170317-53	Solicitation / Contract / Order for Commercial Items	HC-AEO	No objection.		
PTX-57	Lally Ex. 6	11/16/00	SC170123-30	Co-Marketing and Sales Agreement between Network Appliance, Inc. and webwasher.com, AG	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-58	Germany Ex. 44 Lally Ex. 7	03/30/05	SC080499-523	Web Filtering OEM Agreement between Secure Computing Corporation and Blue Coast Systems, Inc.	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-59	Lally Ex. 8	03/30/05	SC170394-96	Amendment One to Web Filtering OEM Agreement between Secure Computing Corporation and Blue Coast Systems, Inc.	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-60	Putman Ex. 1	09/08/06	SC187456-674	Various emails and financial information	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 FRE 106 Lack of Foundation		
PTX-62	Putman Ex. 3		SC072295-327	Secure Computing presentation	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-96			FIN011883	Cyberguard and Secure Computing revenue ratio estimates		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105 FRE 106		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-112		08/2003	SC 01305	Webwasher AG Statement Of Income	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation FRE 106		
PTX-113		2005	SC 01387-418	Webwasher Proactive Scanning – Step-By-Step Guide	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-114		12/17/04	SC 02164-95	Cyberguard “Introduction to Prospective Board Member”	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-115		09/12/06	SC 02247-58	Webwasher 6.0 and New Appliance Launch Positioning Document	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-116			SC 02370-71	Webwasher brochure entitled "Webwasher Hot Sheet"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-117		2005	SC 02553-58	Webwasher Quarterly Growth Year Over Year	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 FRE 106 Lack of Foundation		
PTX-118		12/06/06	SC 02676-770	Webwasher Sales Manual	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-119			SC 02962-64	Webwasher sales report	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-120		11/24/03	SC 05090-96	Webwasher document entitled "Why Companies Choose WebWasher EE Over Finjan"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-121		11/2006	SC011844-68	Secure Computing white paper entitled "Webwasher Proactive Scanning – Step-By-Step Guide"	Confidential	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-122		05/06/05	SC031809-50	Cyberguard Corporation Form 10-Q		FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-123			SC031851-87	Webwasher project comparison	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-124		03/31/06	SC070311-21	Secure Computing SSL Scanner Market Analysis and Business Care	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-125		02/03/06	SC075628-30	Secure Computing SCC Sales Communique	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-126		04/29/04	SC155808-23	RBC Capital Markets Cyberguard Corporation Initiating Coverage report	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-127		04/25/04	SC170556-609	Stock Purchase & Sale Agreement between Cyberguard Corporation, Webwasher AG and The Shareholders Named Herein – Acquisition of the Capital Stock of Webwasher AG	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-129		06/07/06	SC170950-1006	Craig-Hallum Capital Group "Valuation of the Intangible Assets of Cyberguard Corporation as of January 11, 2006"	HC-AEO	No objection.		
PTX-130		02/25/05	SC171075-99	Cyberguard Official Cyberguard International Price List	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-131		2005	SC171337-38	Cyberguard 2005 TSP Release Schedule	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-132			SC185786-804	Webwasher CSM Sales report	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-134			SC187601	Operating Plan – 2006 Macro Plan	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 FRE 106 Lack of Foundation		
PTX-135		2006	SC187604	Secure Computing - Cyberguard Intangible Valuation – Cyberguard Revenue Projections	HC-AEO	FRE 106		
PTX-136			SC187606-07	Webwasher Revenue Chart	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-137		11/03/06	SC187258-63	Webwasher Appliance SKU Change Requests for Q1 Price List Web Gateway Product Marketing	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-138		06/30/06	SC187707-09	Webwasher AG Profit & Loss and Balance Sheet	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation FRE 106		
PTX-139		05/28/04	SC188640-54	Annual Financial Statements as of December 31, 2003 and 2002	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-140		2007	SC189203	Webwasher Billings By Product Report Category	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation FRE 106 FRE 403 (marginalia) Lack of Foundation (marginalia)		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-141		2005	SC189205-06	Cyberguard Budget vs. Actual for the Year Ended June 30, 2005	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 106 FRE 105		
PTX-142		01/23/07	SC189209	Secure Computing Corporation - Gross Margin Report - Product: Webwasher - For the Month Ending December 31, 2006	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 106 FRE 105		
PTX-143		2005	SC189210-12	Cyberguard Quarterly Results by Product Line (FY 2005)	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-144		2006	SC189213	Secure Computing Corporation - Gross Margin Report - Product: Webwasher - For the Month Ending December 31, 2006	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-145		09/10/07	SC189214-18	Cyberguard Corporation Consolidated Budget – Consolidated Summary	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-146		10/03/07	SC189225-26	Cyberguard Corporation - Consolidated Financial Statements – December 31, 2005	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-147				Goldscheider, Jarosz and Mulhern, “Use of the 25 Percent Rule in Valuing IP, les Nouvelles (December 2002)		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-148			SC224648-90	Secure Computing UTM/Firewalls – Q2 Portfolio Analysis	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-149			SC210735-43	Product bookings report	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-150			SC211771-92	Product comparison	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-151		07/31/03	SC139900-13	Malicious Code Scanning – Requirements Criteria	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-152		2004	SC 07795-925	Webwasher User's Guide – Webwasher Anti Virus 5.1	Confidential	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		

EXHIBIT C, PART 2

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-153		2006	SC141340-556	Webwasher User's Guide – Webwasher Anti-Malware Version 6.0	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-154		02/22/05	SC160685-713	Cyberguard white paper entitled "Cyberguard Webwasher CSM Suite: Proactive Security"	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-155		03/02/98	FIN011068-100	Patent Application Serial No. 60/030,639	HC-AEO	No objection if certified version agreed to by the parties.		
PTX-156			FIN013022-28	Provisional Application for U.S. Patent for Computer Network Malicious Code Run-Time Monitoring		No objection if certified version agreed to by the parties.		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-157		06/04/07	FIN014888-901	Gartner Research paper – “Magic Quadrant for Secure We Gateway, 2007”	Confidential	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation FRE 106		
PTX-158		10/29/07	FIN020236-53	Conference Call Transcript from SCUR – Q3 2007 Secure Computing Corporation Earnings Conference Call	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-166		10/12/04		Patent File History for U.S. Patent No. 6,804,780		No objection if certified version agreed to by the parties.		
PTX-167		06/06/06		Patent File History for U.S. Patent No. 7,058,822		No objection if certified version agreed to by the parties.		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-168		07/18/00		Patent File History for U.S. Patent No. 6,092,194		No objection if certified version agreed to by the parties.		
PTX-169		03/12/02		Patent File History for U.S. Patent No. 6,357,010		No objection if certified version agreed to by the parties.		
PTX-170		02/27/07		Patent File History for U.S. Patent No. 7,185,361		No objection if certified version agreed to by the parties.		
PTX-171		10/2004	FIN000298-326	Cyberguard White Paper entitled "Webwasher CSM Suite: Proactive Security"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-172		2004	FIN000245-62	Webwasher White Paper entitled "Webwasher CSM Suite: Adware Prevention"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-173		2004	FIN0000817-47	NetApp Cyberguard White Paper entitled "Proactive Security"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-174		07/1996	FIN021559-642	National Institute of Standards and Technology Small Business Innovation Research – A Marketing Survey of Civil Federal Government Organizations to Determine the Need for a Role-Based Access Control (RBAC) Security Product		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-175		05/01/95	FIN021643-46	Dr. Dobb's article entitled "Role-Based Network Security"		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-176		07/07/94	FIN021647-64	Article entitled "SESAME: The Solution to Security for Open Distributed Systems"		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-177		02/02/99	FIN021665-66	IBM article entitled "Internet Security Systems and Schumann AG Sign OEM Agreement to Integrate Enterprise Security Solutions"		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-178		12/1995	FIN021667-71	NIST/ITL Bulletin entitled "An Introduction to Role-Based Access Control"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-179		1997	FIN021672-79	RBAC article entitled "Role Based Access Control with the Security Administration Manager (SAM)"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-180		06/28/98	FIN021680-85	IEEE article entitled "Authorization and Attribute Certificates for Widely Distributed Access Control"		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-181		03/1998	FIN021686-703	Article entitled "RFC 2307 – An Approach for Using LDAP as a Network Information Service"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-182		12/1997	FIN021704-37	Article entitled "Lightweight Directory Access Protocol (v3)"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-183		06/21/99	FIN021738-47	Article entitled "Authentication methods for LDAP"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-184		01/30/01	FIN021764-845	U.S. Patent No. 6,182,142		No objection if certified version agreed to by the parties.		
PTX-185		11/27/01	FIN021748-63	U.S. Patent No. 6,324,648		No objection if certified version agreed to by the parties.		
PTX-186		10/10/00	FIN021846-65	U.S. Patent No. 6,131,120		No objection if certified version agreed to by the parties.		
PTX-187		03/28/00	FIN021866-83	U.S. Patent No. 6,044,466		No objection if certified version agreed to by the parties.		
PTX-188		09/1998	FIN012499-964	Finjan's Check Point FireWall-1 Architecture and Administration Version 4.0	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-189		10/1998	FIN020016-103	Finjan's Check Point Account Management Client Version 1.1	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-190		07/1999	FIN020104-235	Finjan's Check Point VPN-1/FireWall-1 Reference Guide Version 4.1	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-191			FIN024362-63	Overview of Windows 2000 Active Directory from O'Reilly Ssafari Books Online		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		
PTX-192			FIN024364-73	Windows 2000 Active Directory: Chapter 10. Active Directory Security: Permissions and Auditing		FRE 106 FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-193			FIN024374-81	Windows 2000 Active Directory: 10.3. Designing Permission Schemes		FRE 106 FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-194			FIN024382-85	Windows 2000 Active Directory: 10.5 Real-World Examples		FRE 106 FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-195			FIN024386-99	Windows 2000 Active Directory: 2.2 A more Detailed View of How it All Works		FRE 106 FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-199		09/2002	FIN015621-736	Check Point User Management Guide NG FP3	Confidential	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-200			FIN015830-32	LDAP Authentication		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-201		03/22/99	FIN015833-34	Check Point press release entitled "Check Point Software Enables Firewall-1 and VPN-1 for Novell's NDS"		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-202		05/04/98	FIN015835-37	Check Point press release entitled "Check Point Firewall-1 Version 4.0 Establishes New Benchmark for Easy Deployment of Virtual Private Networks"		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-203		2007	FIN015838-41	Samba "Opening Windows to a Wider World"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-204		09/24/96	FIN019179-97	U.S. Patent No. 5,560,008		No objection if certified version agreed to by the parties.		
PTX-205		05/05/98	FIN019166-78	U.S. Patent No. 5,748,890		No objection if certified version agreed to by the parties.		
PTX-206		02/20/01	FIN019148-65	U.S. Patent No. 6,192,405		No objection if certified version agreed to by the parties.		
PTX-207		09/17/02	FIN019085-147	U.S. Patent No. 6,453,353		No objection if certified version agreed to by the parties.		
PTX-208		2005	FIN012965-91	Finjan's Documents 1Box User Guide	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-209		05/1996	FIN015773-829	Article entitled "Hypertext Transfer Protocol – HTTP/1.0"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-210			FIN015757-72	Apache article entitled "Authentication, Authorization, and Access Control"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-211		1995	FIN015743-56	Article entitled "A Capability Based Authorization Model for the World-Wide Web"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-212		10/18/96	FIN015737-42	Apache article entitled "Using User Authentication"		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-213			FIN012996	Sales Report for Finjan Document IBox	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-215		2005	FIN008703-828	Finjan's Vital Security Series NG-1000/NG-5000/NG-8000 User Guide	Confidential	No objection.		
PTX-216		09/11/07	SC-CD 001	SC-CD 001 containing Excel and TXT documents (Physical Exhibit – CD)	HC-AEO	No objection		
PTX-217		2002		"Computer Security: Art and Science" by Matthew Bishop		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-218		2002		"Computer Networks" by Andrew Tanenbaum		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-219				Webwasher appliance (Physical Exhibit)		FRE 403 Inadequately identified Exhibit		
PTX-220				Finjan's source code (Physical Exhibit)	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation Violates protective order		
PTX-221				Webwasher's source code (Physical Exhibit)	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation Violates protective order		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-222		06/01/04	SC075246-48	Product Meeting Minutes	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-223			SC075259-60	Email from Roland Cuny	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-224			SC076515-16	German document	HC-AEO	All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-225		11/25/05	SC145497-98	Email from Christoph Alme to Yann Le Borgne	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-226			SC146695-715	Feature Requests 5.0 chart	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-227			SC146889-8039	Feature List 4.3 chart	HC-AEO	FRE 106 FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-228			SC153640-43	Comparison of Finjan SurfinGate and Webwasher	HC-AEO	FRE 106 FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-229			SC160532-33	Email	HC-AEO	FRE 402 FRE 403 FRE 802 FRE 901 FRE 106 Lack of Foundation		
PTX-230		06/25/04	SC166330-35	Email to Martin Stecher, Gary Taggart, Thomas Friedrich, Christian Matzen, Jobst Heinemann and Peter Borgolte	HC-AEO	FRE 106 FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-231		06/22/04	SC157322-23	Product Planning Meeting Minutes		FRE 105 FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 Lack of Foundation		
PTX-232			FIN001779-1807	White Paper – Webwasher CSM Suite: Proactive Security (2004)		FRE 105 FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-233			FIN001815-42	White Paper – Webwasher CSM Suite: Proactive Security (2004)		FRE 105 FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-234			FIN009038-68	White Paper – Proactive Security (2004)		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-235			SC10024-51	White Paper – Webwasher CSM Suite: Proactive Security (2004)		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-236			SC164607-634	White Paper – Webwasher CSM Suite: Proactive Security (2004)		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 105		
PTX-237			SC155173-181C	Proactive Security Patent Lists		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 - incomplete Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-239		08/23/06	SC012124	German email from Google Alerts to Christian Ismer		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 - incomplete Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-240		07/26/06	SC074945	German email from Micha Pekrul to Christian Isner		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		
PTX-241		11/22/06	SC075065	German email from Micha Pekrul to tpt		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 901 FRE 106 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-242		03/02/04	SC075220	German email from Thomas Friedrich to Regine Peine		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		
PTX-243		10/11/05	SC075227-228	German email from Horst Joepen to Tim Lange, Martin Stecher, and Oliver Brakow		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-244		10/11/05	SC0752229-31	German email from Martin Stecher to Horst Joepen		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		
PTX-245		10/13/05	SC075232-34	German email from Horst Joepen to Martin Stecher		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-246		10/27/04	SC0145410-13	German email from Christoph Alme to Martin Stecher		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		
PTX-247		02/23/06	SC145499-503	German email from Oliver Brakow to Peter Borgolte		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 106 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-248		01/21/04	SC163460	German email from Heiko Gisselmann to Christopher Hearn		All objections reserved pending translation of foreign language. FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-249	Gallagher Ex. 7		SC01082-1109	Secure Computing Organizational Charts		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-250	Gallagher Ex. 8		SC01080	Secure Computing Family Tree		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-251	Gallagher Ex. 9		SC01081	Secure Computing Subsidiaries Chart		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation		
PTX-252	Gallagher Ex. 10		SC072052-62	Webwasher CSM 5.3.0.1 Product Requirements Document		FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-253	Gallagher Ex. 11		SC133763-78	Webwasher CSM 6.0.0 Product Requirements Document		FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		
PTX-254	Gallagher Ex. 13		SC011732-33	Webwasher Sales Cheat Sheet		FRE 402 FRE 403 FRE 802 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-255	Gallagher Ex. 18	06/16/07	SC072456-544	Webwasher Sales Manual (Oliver Braekow)		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-256	Gallagher Ex. 19	06/16/07	SC033700-91	Webwasher Sales Manual 6.0 (Oliver Braekow)		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		
PTX-257	Gallagher Ex. 20		SC017900-11	Finjan Features/Argument document		FRE 402 FRE 403 FRE 802 FRE 805 FRE 901 FRE 105 Lack of Foundation		

Exhibit No.	Deposition Exhibit No.	Date	Bates Nos.	Description	Limitations On Use	Objections ¹	Marked	Admitted
PTX-258		11/21/07		Exhibit 1 to the Expert Damages Report of Russell Parr, CFA		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 1006		
PTX-259		11/21/07		Exhibit 2 to the Expert Damages Report of Russell Parr, CFA		FRE 402 FRE 403 FRE 802 FRE 901 Lack of Foundation FRE 1006		

[illegible]

Secure Computing objects to the admissibility of any and all underlying facts, data, or documents that are inadmissible and should not be disclosed to the jury by the proponent of the opinion or inference under FRE 703 and 705. Secure Computing, however, reserves the right to seek the disclosure of certain facts, data, or documents relied upon by Finjan's experts as permitted by FRE 705.

Secure Computing objects to the admissibility of document excerpts or the admissibility of pages from documents that have been improperly redacted. Secure Computing reserves the right to offer additional evidence pursuant to FRE 106.

Secure Computing objects to all documents that are inadmissible hearsay if offered by Finjan, but which may be admissible if offered by Secure Computing. Secure Computing reserves the right to offer into evidence trial exhibits that are hearsay if offered by Finjan but that are admissible if offered by Secure Computing.

Secure Computing objects to the admissibility of alleged prior art that has been modified in any way. To the extent exhibits are offered as demonstratives, Secure Computing reserves all objections for such exhibits at the time objections to demonstrative exhibits are exchanged or submitted.

Secure Computing reserves its right to assert additional objections on the grounds of relevance, hearsay, and cumulativeness because Secure Computing is without any information at this time as to the purpose for which Finjan will seek to introduce documents on Finjan's Exhibit List.

Secure Computing makes no concessions as to whether any demonstrative exhibits are appropriate for listing on the exhibit list and takes the general position that demonstratives should not go back to the jury room. Secure Computing submits that the parties should meet and confer on this issue.

Secure Computing objects to the offering of documents that are excerpts of complete exhibits.

Secure Computing objects to offering a collection of separate documents as one exhibit, when some or all of the separate documents are inadmissible under FRE 105, 106, 403, 403, 802, 803, or 901.

Secure Computing reserves the right to use any document identified on Finjan's Exhibit List.

Secure Computing maintains its objections under 901 until Finjan presents proper testimony to authenticate the exhibits.

Secure Computing objects to untranslated foreign language exhibits to the extent Finjan has not provided Secure Computing its translation of the same. Further, Secure Computing reserves all objections to untranslated foreign language exhibits.

Subject to and without waiving these general objections and reservations, Secure Computing submits the following objections. Secure Computing reserves the right to amend and/or supplement these objections.

SECURE COMPUTING'S PROPOSED TRIAL EXHIBIT LIST AND FINJAN'S OBJECTIONS

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1005	01/30/07				U.S. Patent No. 7,171,681	402, 403		
DTX-1006					U.S. Patent File History for 6,092,194	F, 802		
DTX-1007					U.S. Patent File History for 6,804,780	F, 802		
DTX-1008					U.S. Patent File History for 7,058,822	F, 802		
DTX-1009					U.S. Patent File History for 6,357,010	802		
DTX-1010					U.S. Patent File History for 7,185,361	802		
DTX-1011					U.S. Patent File History for 7,171,681	402, 403, 802		
DTX-1012	12/26/00		JA2000	JA2012	U.S. Patent No. 6,167,520	402, 403		
DTX-1013					U.S. Patent File History for 6,167,520	402, 403, F, 802		
DTX-1014	11/12/02		FIN024422	FIN024436	U.S. Patent No. 6,480,962	402, 403		
DTX-1015					U.S. Patent File History for 6,480,962	402, 403, F, 802		
DTX-1016	05/22/98		FIN013110	FIN013150	PCT 97/01626 File History	402, 403, F		
DTX-1017	04/14/98		SC202300	SC202325	U.S. Patent No. 5,740,441	402, 403		
DTX-1018	12/09/97		SC201508	SC201508	U.S. Patent No. 5,696,822	402, 403		

³ Finjan sets forth its objections to Secure Computing's Proposed Trial Exhibit List by abbreviation. The Reference Key for Finjan's Objections to Secure Computing's Proposed Trial Exhibits is attached hereto at Schedule C(2).

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1019	04/22/97		SC201471	SC201491	U.S. Patent No. 5,623,600	402, 403		
DTX-1020	05/09/95		SC188684	SC188727	U.S. Patent No. 5,414,833	402, 403		
DTX-1021	05/27/03		SC202564	SC202575	U.S. Patent No. 6,571,338	402, 403		
DTX-1022	09/14/99		SC189335	SC189353	U.S. Patent No. 5,951,698	402, 403		
DTX-1023	07/17/01		SC189596	SC189603	U.S. Patent No. 6,263,442	402, 403		
DTX-1024	09/24/06		FIN019179	FIN019971	U.S. Patent No. 5,560,008	402, 403		
DTX-1025	05/05/98		FIN019166	FIN019178	U.S. Patent No. 5,758,890	402, 403		
DTX-1026	02/20/01		FIN019148	FIN019165	U.S. Patent No. 6,192,405	402, 403		
DTX-1027	09/17/01		FIN019085	FIN019147	U.S. Patent No. 6,453,353	402, 403		
DTX-1028	11/27/01		FIN021748	FIN021763	U.S. Patent No. 6,324,648	402, 403		
DTX-1029	01/30/01		FIN021764	FIN021845	U.S. Patent No. 6,182,142	402, 403		
DTX-1030	10/10/00		FIN021846	FIN021865	U.S. Patent No. 6,131,120	402, 403		
DTX-1031	03/28/00		FIN021866	FIN021883	U.S. Patent No. 6,044,466	402, 403		
DTX-1032	11/09/99		SC202542	SC202575	U.S. Patent No. 5,983,348	402, 403		
DTX-1033	01/26/99		JA2365	JA2401	U.S. Patent No. 5,864,683	402, 403		
DTX-1034					U.S. Provisional Patent Application No. 60/030,639	F, 402, 403		
DTX-1035	05/17/00				U.S. Provisional Patent Application No. 60/205,591	F, 402, 403		
DTX-1036	12/11/07				Markman Order	403, 704		
DTX-1037	00/00/97		JA1228	JA1232	Zhang, X.N. Secure Code Distribution	F, 402, 403, 802		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1038	00/00/96		JA2038	JA2072	McDaniel, George, IBM Dictionary of Computing (10th ed)	F, 402, 403, 802		
DTX-1039	00/00/96		JA2073	JA2076	Downing, Douglas A. et al, Dictionary of Computer and Internet Terms (5th ed)	F, 402, 403, 802		
DTX-1040	06/17/95		JA2077	JA2079	Dictionary of Computer Words: An A to Z Guide to Today's Computers (Revised Edition)	F, 402, 403, 802		
DTX-1041	01/00/97		JA2159	JA2162	Chappell, David. Introducing Active X	F, 402, 403, 802		
DTX-1042	09/07/07		JA2163	JA2164	Search Result from USPTO Trademark Electronic Search System (TESS)	F, 402, 403, 802		
DTX-1043			JA2165	JA2190	'361 Patent, Appellants' Brief on Appeal	F, 402, 403, 802		
DTX-1044	00/00/93		JA2348	JA2350	Webster's New World Dictionary of Computer Terms (5th ed)	F, 402, 403, 802		
DTX-1045	00/00/03		JA2351	JA2353	Garner, Bryan A. Modern American Usage, Oxford University Press	F, 402, 403, 802		
DTX-1046	00/00/07		JA2354	JA2360	Secure Computing - Company Fact Sheet	802		
DTX-1047	09/28/07		JA2361	JA2364	Secure Computing - "Sidewinder-The Origin of Sidewinder G2 Security Appliance	402, 403, 802		

EXHIBIT C, PART 3

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1048	07/03/06		JA2402	JA2413	Committee Membership Information: Technical Privacy Dimensions of Information for Terrorism Prevention and Other National Goals	F, 402, 403, 802		
DTX-1049	09/28/07				Affidavit of Paul Judge	402, 403, 802, F, 901		
DTX-1050					Cisco 1997 Annual Report from Cisco's website	402, 403, 802, 901, F, NP		
DTX-1056	06/01/04		SC075246	SC075248	Email re Product Meeting Minutes	F. 402, 403		
DTX-1057		Alme/4	SC0003430	SC0003467	Webwasher Proactive Scanning			
DTX-1058	07/05/04	Alme/5	SC0001360	SC0001386	Webwasher Mobile Code Filter			
DTX-1059	00/00/07	Alme/6			White Paper; Webwasher Proactive Scanning Step-by-Step Guide			
DTX-1060	00/00/05	Alme/7	SC066232	SC066263	Webwasher CSM Suite; Webwasher Proactive Scanner Step-by-Step Guide			
DTX-1061	00/00/05	Alme/8	SC071937	SC071967	Webwasher CSM Suite; Webwasher Proactive Scanner Step-by-Step Guide			
DTX-1062	07/19/06	Alme/9	SC032421	SC032424	Webwasher Proactive Scanning - Visible new features in version 6.0			
DTX-1063		Alme/15			Handwritten Drawing			
DTX-1064	05/28/04	Alme/16	SC166301	SC166302	Email re: proactive security			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1065	04/14/05	Alme/17	SC166653	SC166659	Email re: ww Proactive Scanning database			
DTX-1066	12/29/05	Alme/18	SC145290	SC145306	Email re: Ideen / Plane für den nächsten Proactive Scanning Milestone			
DTX-1068	00/00/05	Ben-Itzhak/1002	FIN0003541	FIN0003542	Brochure; Documents 1-Box	F, 402, 403		
DTX-1069	00/00/05	Ben-Itzhak/1003	FIN0008703	FIN0008828	Vital Security Appliance Series NG 1000/NG-5000/NG-8000 - User Guide	F, 402, 403		
DTX-1070	00/00/06	Ben-Itzhak/1004	SC011267	SC011453	Management Console Reference Guide - Vital Security Web Appliances NG1100/NG-5100/NG-8100	F, 402, 403		
DTX-1071	04/00/06	Ben-Itzhak/1005	FIN014850	FIN014887	Finjan / Webwasher Competitive Analysis	F, 402, 403		
DTX-1072	07/00/04	Ben-Itzhak/1009	SC023181	SC023231	Market Analysis - Worldwide Secure Content Management 2004-2008 Forecast Update and 2003 Vendor Shares: A Holistic View of Antivirus, Web Filtering, and Messaging Security			
DTX-1073	06/24/05	Ben-Itzhak/1010	FIN0000878	FIN0000896	Confidential Patent License Agreement between Finjan Software and Microsoft	F		
DTX-1074	06/23/05		FIN0000897	FIN0000903	Resolution of Board of Finjan Software Ltd. For Grant of License	F		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1075	01/26/01	Ben-Itzhak/1011	FIN009694	FIN009695	Letter re: Finjan Software Technology	F, 402, 403, 802		
DTX-1076	06/06/06	Ben-Itzhak/1012			Finjan Press Release	402, 403, 802, F		
DTX-1077	01/01/06	Ben-Itzhak/1013	FIN003147	FIN003148	Email re: question	802, 402, 403		
DTX-1078	02/20/06	Ben-Itzhak/1014	FIN009004		Email re: Microsoft agreement	402, 403, F, 802		
DTX-1079	02/17/05	Ben-Itzhak/1015			US Patent Application Publication; US2005/0038881 A1 - Method for the Automatic Setting and Updating of a Security Policy	402, 403		
DTX-1080	06/14/07	Ben-Itzhak/1016			US Patent Application Publication; US2007/0136811 A1 - System and Method for Inspecting Dynamically Generated Executable Code	402, 403		
DTX-1081	06/21/07	Ben-Itzhak/1017			US Patent Application Publication; US2007/0143270 A1 - System and Method for Appending Security Information to Search Engine Results	402, 403		
DTX-1082	06/21/07	Ben-Itzhak/1018			US Patent Application Publication; US2007/ 0143271 A1 - System and Method for Appending Security Information to Search Engine Results	402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1083	08/02/07	Ben-Itzhak/1019			US Patent Application Publication; US2007/0033256 A1 - System and Method for the Prevention of Unsolicited Calls and Contacts	402, 403		
DTX-1084	10/30/03	Ben-Itzhak/1020			US Patent Application Publication; US2003/0204719 A1 - Application Layer Security Method and System	402, 403		
DTX-1085	01/30/03	Ben-Itzhak/1021			US Patent Application Publication; US2003/00	402, 403		
DTX-1086	04/03/97	Ben-Itzhak/2071	FIN009693		Invoice No. 30002	402, 403		
DTX-1087	01/12/98	Ben-Itzhak/2072	FIN001550	FIN001565	Finjan Board Meeting Q4 1997	F		
DTX-1088	11/02/07	Ben-Itzhak/2073			Web Pages from Finjan.com; Finjan Competitive Intelligence	F, 402, 403, 802, 901		
DTX-1089	06/04/07	Ben-Itzhak/2074			Press Release from Web at Finjan.com from Gartner IT Security Summit in Washington, D.C.	F, 402, 403, 802, 901		
DTX-1090	03/00/07	Ben-Itzhak/2075			Executive Summary - Cisco-Finjan Enhanced Content Security Solutions	F, 402, 403, 802, 901		
DTX-1091	11/26/04	Berzau/50	SC031938	SC031939	Meeting Minutes; Meeting Protocol			
DTX-1092	10/20/06	Berzau/51	SC114086	SC114087	Outline; Q4 Objectives & Key Results	402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1093	06/22/07	Berzau/52	SC145492	SC145496	Finjan Vital Security for Web			
DTX-1094	08/04/06	Borgolte/53	SC029007	SC029008	Email re: minutes product meeting August 1, 2006			
DTX-1095		Ederly/2017	FIN006546	FIN006652	The Finjan SurfIn Console	F, 402, 403		
DTX-1096	08/29/02	Ederly/2018	FIN007944	FIN007959	Script Scanning Engine	F, 402, 403		
DTX-1097	05/00/02	Ederly/2019	FIN007854	FIN007897	SurfIn Gate 7.0 White Paper	F, 402, 403		
DTX-1098	08/00/02	Ederly/2020	FIN007898	FIN007943	SurfIn Gate for E-Mail; White Paper	F, 402, 403		
DTX-1099	09/07/01	Ederly/2021			Web pages from computerworld.com; re Finjan	F, 402, 403, 802		
DTX-1100	00/00/04	Ederly/2022	FIN008356	FIN008392	Vital Security for Web - Technical White Paper	402, 403, 901, F		
DTX-1101	00/00/03	Ederly/2023			SurfInGate for WebTM Service Pack 1 For Windows/Solaris	F, 402, 403		
DTX-1102	03/31/05	Ederly/2024			Patent Application; Aggregating the Knowledge Base of Computer Systems to Proactively Protect a Computer from Malware	F, 402, 403		
DTX-1103	03/29/05	Ederly/2026			Patent Application; Latency Free Scanning of Malware at a Network Transit Point	F, 402, 403		
DTX-1104		Elbaz/1022			Finjan Web Page, "Management Team Biography of Linnor Elbaz"	F, 402, 403		
DTX-1106	06/11/03	Elbaz/1024			Finjan Press Release	F, 402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1107	01/00/07	Elbaz/1025	SC011456	SC011469	Technical Brief - Authentication / Identification and Transparent Mode; Vital Security Release Version 4.3	F, 402, 403		
DTX-1108	03/10/05	Elbaz/1026	FIN009255	FIN009257	Email thread re: Finjan SDK	F, 402, 403		
DTX-1109	01/16/05	Elbaz/1027	FIN009224	FIN009229	Email thread re: Finjan SDK	F, 402, 403		
DTX-1110	04/18/05	Elbaz/1028	FIN009272	FIN009275	Email thread re: pricing	F, 402, 403		
DTX-1111	02/28/05	Elbaz/1029	FIN009340	FIN009342	Email thread re: Secure Computing proposition	F, 402, 403		
DTX-1112	07/25/05	Elbaz/1030	FIN009471	FIN009472	Email thread re: 5100 box	F, 402, 403		
DTX-1113	10/00/00	Elbaz/1031			Discretix Technologies White Paper; Strength Assessment of Encryption Algorithms	F, 402, 403		
DTX-1114	03/00/07	Elbaz/1032			Malicious Page Under Benchmark	F, 402, 403		
DTX-1115	03/28/07	Elbaz/1033			Finjan Press Release	F, 402, 403		
DTX-1116	11/06/03	Frommer/2036			Finjan Press Release	F, 402, 403		
DTX-1118	10/11/07	Frommer/2038	FIN018223	FIN018262	Chart - salesforce.com	F		
DTX-1119	10/11/07	Frommer/2039	FIN018263	FIN018266	Chart - salesforce.com	F		
DTX-1121	01/08/06	Gallagher/7	SC001082	SC001109	Organization Charts			
DTX-1122	01/07/06	Gallagher/8	SC001080		Organizational Flowchart			
DTX-1123		Gallagher/9	SC001081		Company Subsidiary Flowchart			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1124		Gallagher/ 10	SC072052	SC072062	Webwasher CSM 5.3.0.1 - Product Requirements Document			
DTX-1125	05/15/06	Gallagher/ 11	SC133763	SC133778	Webwasher CSM 6.0.0. - Product Requirements Document			
DTX-1127		Gallagher/ 13	SC011732	SC011733	Webwasher Sales Cheat Sheet			
DTX-1128	08/00/04	Gallagher/ 14	SC072833	SC072868	Market Analysis: Worldwide Antivirus Software Forecast and Analysis, 2003-2007: Return of the Consumer			
DTX-1129	07/00/04	Gallagher/ 15	SC023181	SC023231	Market Analysis: Worldwide Secure Content Management 2004-2008; Forecast Update and 2003 Vendor Shares: A Holistic View of Antivirus, Web Filtering, and Messaging Security	Duplicate		
DTX-1130	09/00/05	Gallagher/ 16	SC076359	SC076440	Market Analysis: Worldwide Secure Content Management 2005-2009 Forecast Update and 2004 Vendor Shares: Spyware, Spam, and Malicious Code Continue to Wreak Havoc			
DTX-1131		Gallagher/ 17	SC011759	SC011762	Product Overview - Webwasher Products			
DTX-1132	06/16/07	Gallagher/ 18	SC072456	SC072544	Webwasher Sales Manual			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1133	06/16/07	Gallagher/19	SC033700	SC033791	Webwasher Sales Manual - Webwasher 6.0			
DTX-1134		Gallagher/20	SC017900	SC017911	Chart; Finjan Feature	802		
DTX-1135	06/06/05	Gallagher/21	SC003318	SC003333	Webwasher URL Filter 5.2, Webwasher Anti Virus 5.2 vs. Finjan Vital Security for Web 8			
DTX-1136	07/27/05	Greve/3	SC187686	SC187706	Analysis & Estimation - Virus Harvesting and Autorating			
DTX-1139	00/00/07	Kaye/2030			Installation and Setup Guide; Vital Security Appliance Series - NG-1000/NG-5000/NG-6000/NG-8000; Software Release 8.5.0	402, 403, F		
DTX-1140	00/00/06	Kaye/2031	SC011260	SC011266	Brochure; Vital Security Appliance NG 1100; All-in-One Proactive Web Security Solution for SMBs	402, 403, F		
DTX-1141	00/00/06	Kaye/2032	SC011470	SC011475	Brochure; Vital Security Web Appliance	402, 403, F		
DTX-1142	00/00/05	Kaye/2033	FIN008011	FIN008338	User Manual; Vital Security for Web 7.0 Service Pack 4	F, 402, 403		
DTX-1144	00/00/06	Kaye/2035	FIN017335	FIN017453	Security Policies In-Depth; Vital Security Web Appliances NG-1100/NG-5100/NG8100	F, 402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1145		Kroll/2	FIN013022	FIN013028	Provisional Patent Application for United States Patent for Computer Network Malicious Code Run-Time Monitoring	F, 402, 403		
DTX-1146	10/01/98	Kroll/3			Finjan Press Release re: IBM	402, 403		
DTX-1147	01/19/99	Kroll/4			Finjan Press Release re: IBM	402, 403		
DTX-1148	05/18/99	Kroll/5			Finjan Press Release	402, 403		
DTX-1149	07/31/00	Kroll/6			Finjan Press Release	402, 403		
DTX-1150	07/20/99	Kroll/7			Finjan Press Release	402, 403		
DTX-1151	05/06/02	Kroll/8			Finjan web page article	F, 402, 403, 802, 901		
DTX-1152	06/08/00	Kroll/9			Web pages; The Langelist newsletter	F, 402, 403, 802, 901		
DTX-1153	11/07/06	Lally/2	SC170299	SC170316	Reseller Agreement between immixTechnology and Secure Computing Corporation	402, 403		
DTX-1154	10/24/02	Lally/3	SC170200	SC170212	Cisco AVVID Partner Program Agreement			
DTX-1155	08/19/05	Lally/4	SC115251	SC115263	Webwasher 5.2 Pricing Guide			
DTX-1156	01/19/07	Lally/5	SC170317	SC170353	Invoice; Order for Commercial Items	402, 403		
DTX-1157	11/16/00	Lally/6	SC170123	SC170130	Co-Marketing and Sales Agreement between Network Appliance and webwasher.com AG			
DTX-1158		Lally/7	SC080499	SC080523	Blue Coat Web Filtering OEM Agreement			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1159	07/01/06	Lally/8	SC170394	SC170396	Amendment One to the Web Filtering OEM Agreement between Secure Computing and Blue Coat Systems			
DTX-1160	10/10/05	Polani/2041	FIN019198		Email re: IPPP status	F, 402, 403		
DTX-1161	01/04/06	Polani/2042	FIN009069		Meeting notice: Updated - IPPP update prior Board meeting	F, 402, 403		
DTX-1162	01/10/06	Polani/2043	FIN014759		Email re: Agenda today	F, 402, 403		
DTX-1176	09/08/06	Putnam/1	SC187456	SC187674	Email with attachments	402, 403, 802, 901, F		
DTX-1178	09/28/07	Putnam/3	SC072295	SC072327	Web Gateway Security			
DTX-1188	10/03/07	Sofer/1044			Letter from Holdreith to Hannah	F, 402, 403, 802		
DTX-1196		Stecher/19	SC077266	SC077274	Webwasher 5 Training Proactive Security			
DTX-1197	04/04/05	Stecher/20	SC002099	SC002163	Webwasher Product Roadmap	802		
DTX-1198		Stecher/21	SC066200	SC066221	Webwasher SCM 6.0 - Anti-Malware - New Features as of Release 6.0			
DTX-1199		Stecher/22	SC003501	SC003628	Webwasher Overview Materials			
DTX-1203	08/09/04	Stecher/26	SC145463	SC145490	White Paper - Webwasher CSM Suite: Proactive Security			
DTX-1204	02/28/05	Stecher/27	SC022423	SC022436	Webwasher Anti-Spam and Anti-Virus 5; Finjan Vital Security for E-mail; Version 1.0			
DTX-1207		Stecher/30	SC072063	SC072083	Webwasher 6.0.0; Products Requirement Document			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1208	09/16/02	Stecher/31	SC077630	SC077631	Email	802		
DTX-1209	05/23/03	Stecher/32	SC077723	SC077725	Email re: Minutes: Product Meeting			
DTX-1210	05/20/03	Stecher/33	SC153656	SC153663	Finjan SurfInGate Web 7.0 Competitive Analyses			
DTX-1211	09/16/03	Stecher/34	SC077703	SC077705	Email; Product Meeting Minutes			
DTX-1212	04/19/04	Stecher/35			Email; meeting minutes - Product Planning September Release Workshop			
DTX-1213	06/18/04	Stecher/36	SC166304	SC166318	Email re: Straw Man / Draft Press Release to Announce Proactive Security Feature			
DTX-1214	01/07/04	Stecher/37	SC075235	SC075236	Email re: product meeting minutes			
DTX-1215	06/29/04	Stecher/38	SC155173	SC155181	Report on Proactive Security			
DTX-1216		Stecher/39	SC077768	SC077769	Email re: Webwasher			
DTX-1217	03/03/05	Stecher/40	SC153611	SC153612	Weekly status report			
DTX-1218	04/07/06	Stecher/41	SC074938	SC074939	Email			
DTX-1219	00/00/06	Stecher/42	SC067894	SC067905	"Overcoming addiction to signatures"			
DTX-1220	04/14/06	Stecher/43	SC146034	SC146062	Quotation - UBS Group; Anti-Virus Gateway Project - version 1.3; revised release			
DTX-1222	06/09/06	Stecher/45	SC001335	SC001340	Email re: Finjan / SmartFilter OEM Agreement			
DTX-1223	04/08/06	Stecher/46	SC010247		Email re: Clarification			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1224		Stecher/47	SC020500		List; Patents			
DTX-1225	01/12/06	Stecher/48	SC074980	SC074983	Email thread re: Finjan Web Security SDK			
DTX-1226	10/04/04	Stecher/49	SC028994	SC028996	Email re: Credit Suisse win			
DTX-1227	06/21/05	Touboul/2003			Patent Application re: Malicious Mobile Code Runtime Monitoring System and Methods - Request to Correct Inventorship	F, 402, 403		
DTX-1228	02/05/06	Touboul/2004			Letter re: Separation Agreement	F, 402, 403,		
DTX-1229	00/00/96	Touboul/2005	FIN008967	FIN008975	Finjan Software Ltd. Employment Agreement with Shlomo Touboul	F, 402, 403		
DTX-1230		Touboul/2006	FIN010489	FIN010490	Powerful PC Security for the New World of Java and Downloadables	402, 403, F		
DTX-1231	10/31/96	Touboul/2007	FIN010223	FIN010225	Finjan Company Profile	402, 403, F		
DTX-1232	02/11/97	Touboul/2008	FIN001088	FIN001090	Letter to Touboul	F, 402, 403		
DTX-1233		Touboul/2009			Web page; Security Products - The Code Breakers; new hacker methods and motives push need for proactive security solutions	402, 403, F		
DTX-1234	00/00/05	Touboul/2057	FIN012965	FIN012991	User Guide - Documents 1 Box	F, 402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1235		Touboul/ 2058	FIN011347	FIN011348	Verified Statement (Declaration) Claiming Small Entity Status (37 CFR 1.9(f) and 1.37(c) - Small Business Concern	F, 402, 403		
DTX-1237	05/06/01	Touboul/ 2060	FIN019922		Letter re: Aladdin Knowledge Systems Ltd. and Finjan Software	F, 802, 402, 403		
DTX-1239	04/07/98	Touboul/ 2062	FIN014942	FIN014983	OEM Software License Agreement between Cisco Systems and Finjan Software	402, 403, F		
DTX-1240	01/14/99	Touboul/ 2063	FIN014988	FIN015000	Licensed Works Agreement - Statement of Work between IBM and Finjan Software	F, 402, 403		
DTX-1241		Touboul/ 2064			Brochure; Yoggie - the Laptop Bodyguard	F, 402, 403		
DTX-1242	07/17/07	Touboul/ 2065			Notes; Technology: What is Yoggie L-8 security engine?	F, 402, 403		
DTX-1243		Touboul/ 2066			Notes re: downloadable language	402, 403, F, 901, 704, 701		
DTX-1244	00/00/96	Touboul/ 2067	FIN001097	FIN001100	Brochure: The Corporate Firewall for Downloadables	F, 402, 403		
DTX-1245	07/22/98	Touboul/ 2068	FIN001619	FIN001622	Executive Summary	F, 402, 403		
DTX-1246	12/30/03	Touboul/ 2069	FIN018946	FIN018960	Vital Security - Summary of Content Scanner Meeting	F, 402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1247	03/14/06	Touboul/ 2070			Nonprovisional Application for United States Patent in the Name of Shlomo Touboul for System and Method for Providing Network Security to Mobile Devices	F, 402, 403		
DTX-1248	10/17/99	Vered/2010	FIN005386	FIN005396	Surfinguard 1.0 - Marketing Requirements Document	F, 402, 403		
DTX-1249		Vered/2011	FIN005475	FIN005566	Surfinguard information	F, 402, 403, 802		
DTX-1250	00/00/99	Vered/2012	FIN005439	FIN005463	Surfinguard User Manual and Installation Guide	F, 402, 403		
DTX-1251	05/08/00	Vered/2013	FIN003431	FIN003432	Press Release - "Free Internet Security Utility 'Surfinguard' Blocks Trojan Horses and Worms - ideal for DSL and Cable Modem Users"	F, 402, 403		
DTX-1252	05/01/98	Vered/2014	FIN003148	FIN003172	Technical Overview - Enterprise Security for Mobile Code	F, 402, 403		
DTX-1253	05/17/00	Vered/2015			Provisional Application for Patent Cover Sheet	F, 402, 403		
DTX-1254	09/08/99	Vered/2016			Finjan Press Release	F, 402, 403, 802, 901,		
DTX-1256	00/00/04		SC007795	SC007925	Webwasher Anti-Virus 5.1 User's Guide			
DTX-1257	00/00/05		SC001387	SC001418	Webwasher Proactive Scanning - Step by-step Guide			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1258	07/31/03		SC139900	SC139913	Malicious Code Scanning - Requirements Criteria			
DTX-1260	00/00/06		SC141340	SC141355	User's Guide - Webwasher Anti-Malware version 6.0			
DTX-1261	00/00/04		SC160685	SC160713	White Paper - CyberGuard Webwasher CSM Suite: Proactive Security			
DTX-1262	00/00/04		SC164607	SC164634	White Paper - Webwasher CSM Suite: Proactive Security			
DTX-1263	00/00/91		SC189227	SC189233	"Towards a Tested for Malicious Code Detection," Kerchen, et al.	802, F		
DTX-1264	05/04/94		SC189272	SC189298	"MCF: A Malicious Code Filter," Lo, et al.	802, F		
DTX-1265	00/00/95		SC189299	SC189316	Anti-Virus Tools and Techniques for Computer Systems, Polk, et al. Chapter 4	802, F		
DTX-1266	00/00/05		SC011256	SC011257	Documents lBox	F		
DTX-1267	00/00/03		SC011258	SC011259	Vital Security for Enterprise Documents	F		
DTX-1268	09/00/93		SC200423	SC200432	"Combating Viruses Heuristically," Veldman	802, F, 402, 403		
DTX-1269	09/16/96				"Personal Security Assistance for Secure Internet Commerce (position paper)," Rasmusson, et al. Available as dvi, ps, html, at http://www.sics.se/~ara/papers/NSP96.html	802, F, 402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1270	09/00/96				Firewall Toolkit "fwtk-2.0beta.tar.z" source code	F, 802, 402, 403, 901		
DTX-1271			SC189633	SC189635	"Finjan : Vital Security for Documents," marketing material found at URL below, hereafter "Presence". http://www.presence-security.co.uk/index.cfm/page/products.details.cfm/id/196	F, 901, 402, 403		
DTX-1272					"Finjan Software Launches a New Product - Vital Security for SSL", press release dated July 19, 2004 at the URL below. Hereafter "PR". http://www.finjan.com/Pressrelease.aspx?PressLAN=329&id=424&lan=3	F, 402, 403		
DTX-1273			SC189604	SC189608	http://www.finjan.com/content.aspx?id=190	F, 402, 403		
DTX-1274					Finjan Vital Security Appliance with software	Inadequately identified exhibit-NP, 403		
DTX-1275					Webwasher Appliance with software	Inadequately identified exhibit-NP, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1276	10/00/96		SC000749	SC000763	Microsoft Authenticode Technology: Ensuring Accountability and Authenticity for Software Components on the Internet	F, 402, 403, 802		
DTX-1277			SC189609	SC189632	A Complete ActiveX Web Control Tutorial: http://www.codeproject.com/KB/COM/CompleteActiveX.aspx	F, 402, 403, 802, 403		
DTX-1278	06/07/06		SC170950	SC171006	Valuation of the Intangible Assets of Cyberguard as of Jan 11, 2007	402, 403		
DTX-1281	11/24/03		SC005090	SC005096	WebWasher, Why Companies Choose WebWasher EE Over Finjan			
DTX-1282	12/14/06				Plaintiff's Responses to Defendants' First Set of Interrogatories	802, 402, 403		
DTX-1283	05/17/07				Plaintiff's Responses to Defendants' Second Set of Interrogatories	802, 402, 403		
DTX-1284	06/29/07				Plaintiff's Responses to Defendants' Third Set of Interrogatories	802, 402, 403		
DTX-1285	07/20/07				Plaintiff's Responses to Defendants' Fourth Set of Interrogatories	802, 402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1286	09/14/07				Plaintiff's Responses to Defendants' Fifth Set of Interrogatories	802, 402, 403		
DTX-1287	11/14/07				Finjan's Supplemental Responses to Defendants' First Set of Interrogatories	802, 402, 403		
DTX-1288	11/14/07				Finjan's Supplemental Responses to Defendants' Second Set of Interrogatories	802, 402, 403		
DTX-1289	11/14/07				Finjan's Supplemental Responses to Defendants' Third Set of Interrogatories	802, 402, 403		
DTX-1290	08/03/07				Plaintiff's Supplemental Responses to Defendants' Fourth Set of Interrogatories	802, 402, 403		
DTX-1291	11/14/07				Finjan's Supplemental Responses to Defendants' Fifth Set of Interrogatories	802, 402, 403		
DTX-1292	02/10/03		FIN000938	FIN000946	Invoice #5512	F, 402, 403		
DTX-1294			SC-CD001		CD ROM containing SWMS search results from Inspection September 11, 2007	402, 403, 901, 1006		
DTX-1295	11/09/07				Letter from Seidl to Hannah	402, 403, F, 802, 901,		
DTX-1296					www.securecomputing.com website excerpts	Inadequately identified Exhibit-402, 403, 802, 901, NP, F		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1297					www.finjan.com website excerpts	Inadequately identified exhibit-402, 403, 802, 901, NP, F		
DTX-1305	03/05/07		FIN024421	FIN024449	Letter from Andre to Cooley firm re U.S. Patents '520 and '962	F, 402, 403, 802		
DTX-1306	03/26/07		FIN024420		Letter from Cooley firm to Andre re U.S. Patents '520 and '962	F, 402, 403, 802		
DTX-1307	12/05/07				Email from Hannah to Seidl	Inadequate identification-402, 403, F, 802, 901		
DTX-1308	11/14/07				Letter from Hannah to Seidl	Inadequate identification-402, 403, F, 802, 901		
DTX-1309	12/01/05		FIN024551	FIN024563	Letter from Ernst & Young	F, 802, 402, 403		
DTX-1310			SC189649		US Federal Gov't Webwasher Sales 1/1/2006 - 9/30/2007	402, 403		
DTX-1312	05/28/04		SC188640	SC188654	Webwasher AG Financial Statements as of December 31 2002 and 2003			
DTX-1313			FIN003574	FIN003575	Brochure: Vital Security Appliance NG - 5300	F, 402, 403		
DTX-1314			SC031851	SC031887	Webwasher spreadsheet			

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1315	03/31/06		SC070311	SC070321	SSL Scanner Market Analysis and Business Case			
DTX-1318			SC189203		Webwasher Billings by Product Report Category			
DTX-1319	06/30/05		SC189204	SC189208	Cyberguard Budget v Actual			
DTX-1320			SC189210	SC189212	Cyberguard Quarterly Results for FY 2005			
DTX-1321	12/31/06		SC189213		Secure Gross Margin Report			
DTX-1322	09/10/07		SC189214	SC189218	FY 2006 CGFW Consolidated Budget			
DTX-1323	05/10/06		SC170346	SC170353	Solicitation/Contract/Order for Commercial Items No. 628	402, 403		
DTX-1324	01/19/07		SC170324	SC170330	Solicitation/Contract/Order for Commercial Items No. 761	402, 403		
DTX-1325	01/19/07		SC170317	SC170323	Solicitation/Contract/Order for Commercial Items No. 760	Duplicate		
DTX-1326	01/10/07		SC170338	SC170345	Solicitation/Contract/Order for Commercial Items	402, 403		
DTX-1327	01/11/07		SC170331	SC170337	Solicitation/Contract/Order for Commercial Items	402, 403		
DTX-1328	12/18/04		SC170252	SC170289	Distributor Agreement between Cyberguard Corp. and Fromark Technology	402, 403		
DTX-1329	03/02/06		SC170290	SC170298	Program Agreement between Secure Computing and Government Channels Group, Inc.	402, 403		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1330	11/07/07				Email thread between Seidl and Hannah re source code inspection confirmation	Inadequate identification-402, 403, F, 802, 901		
DTX-1331	11/15/07				Email thread between Seidl and Kastens re source code review confirmation	Inadequate identification-402, 403, F, 802, 901		
DTX-1332	12/10/07				Email thread from Seidl to Hannah re inspection	Inadequate identification-402, 403, F, 802, 901		
DTX-1333	12/11/07				Letter from Seidl to Kastens re ".dat" files	Inadequate identification-402, 403, F, 802, 901		
DTX-1334	00/00/91		SC189650	SC189658	"Towards a Testbed for Malicious Code Detection," Kerchen, et al. from the Lawrence Livermore National Laboratory	802, 402, 403, F		
DTX-1335	12/12/07				Figure 1 from the Response Expert Report of Carl Degen	802, 1006		
DTX-1336	12/12/07				Figure 2 from the Response Expert Report of Carl Degen	802, 1006		
DTX-1337	12/12/07				Figure 2A from the Expert Report of Carl Degen	802, 1006		
DTX-1338	12/12/07				Figure 3 from the Response Expert Report of Carl Degen	802, 1006		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1339	12/12/07				Figure 4 from the Response Expert Report of Carl Degen	802, 1006		
DTX-1340	12/12/07				Figure 5 from the Response Expert Report of Carl Degen	Inadequate identification-402, 403, F, 802, 901		
DTX-1341	12/12/07				Figure 6 from the Response Expert Report of Carl Degen	Inadequate identification-402, 403, F, 802, 901		
DTX-1342	12/12/07				Figure 7 from the Response Expert Report of Carl Degen	Inadequate identification-402, 403, F, 802, 901		
DTX-1343	11/20/07				Figure 1 from the Expert Report of Carl Degen	802, 1006		
DTX-1344	11/20/07				Figure 2 from the Expert Report of Carl Degen	802, 1006		
DTX-1345	11/20/07				Figure 2A from the Expert Report of Carl Degen	802, 1006		
DTX-1346	11/20/07				Figure 3 from the Expert Report of Carl Degen	802, 1006		
DTX-1347	11/20/07				Figure 4 from the Expert Report of Carl Degen	802, 1006		
DTX-1348	11/20/07				Figure 4A from the Expert Report of Carl Degen	802, 1006		
DTX-1349	11/21/07				Exhibit C from the Expert Report of Dan Wallach	402, 403, 1006, 704		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1350	11/30/07	Vigna/4			Supplemental Exhibit C from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1351	11/21/07				Exhibit D from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1352	11/30/07				Supplemental Exhibit D from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1353	11/21/07				Exhibit E from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1354	11/30/07				Supplemental Exhibit E from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1355	11/21/07				Exhibit F from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1356	11/30/07				Supplemental Exhibit F from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1357	11/21/07				Exhibit G from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1358	11/30/07				Supplemental Exhibit G from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1359	11/21/07				Exhibit H from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1360	11/30/07				Supplemental Exhibit H from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1361	11/21/07				Exhibit I from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1362	11/30/07				Supplemental Exhibit I from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		

Exhibit No.	Date	Deposition Exhibit	Bates No. Start	Bates No. End	Description	Objections ³	Marked	Admitted
DTX-1363	11/21/07				Exhibit J from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1364	11/30/07				Supplemental Exhibit J from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1365	11/21/07				Exhibit K from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1366	11/21/07				Exhibit L from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1367	11/21/07				Exhibit M from the Expert Report of Dan Wallach	402, 403, 1006, 704		
DTX-1368	11/21/07				Exhibit N from the Expert Report of Dan Wallach	402, 403, 1006, 704, NP		
DTX-1375		Parr/5	SC002676	SC002770	Webwasher sales manual	Duplicate		
DTX-1379	04/10/06	Parr/9	SC187586		Email from Stevenson to Putman re customers	Duplicate		
DTX-1380	04/19/04	Parr/10	SC030765	SC030766	Email from Cuny re meeting minutes	402, 403		
DTX-1383		Parr/14	SC187606	SC187607	Financial charts	Duplicate		
DTX-1385	00/00/05	Parr/17	FIN003559	FIN003560	Vital Security SDK brochure	F, 402, 403		
DTX-1389		Parr/13; Degen/5	SC189203	SC189218	Webwasher Billings by Product Report Category	Duplicate		
DTX-1396	06/12/98	Jaeger/8			Web article from Apacheweek: Apache status http://www.apacheweek.com/issues/98-06-12	F, 402, 403, 802		

FINJAN'S GENERAL OBJECTIONS, RESERVATIONS, AND NOTES

Finjan objects to all alleged prior art references that are not relied on for alleged anticipation or obviousness in Secure Computing's expert reports under FRE 402 and 403 on grounds of undue delay, waste of time, and needless presentation of cumulative evidence; Finjan reserves the right, however, to offer such references in rebuttal to show that Secure Computing's primary alleged prior art references are cumulative of art disclosed and considered by the United States Patent and Trademark Office, or to use such references for purposes of impeachment.

Finjan reserves its right to assert additional objections on the grounds of Federal Rule of Evidence 602 because Finjan is without any information at this time as to how the Secure Computing will seek to introduce documents on Secure Computing's Exhibit List.

Finjan objects to the admissibility of any and all underlying facts, data, or documents that are inadmissible and should not be disclosed to the jury by the proponent of the opinion or inference under FRE 703 and 705. Finjan, however, reserves the right to seek the disclosure of certain facts, data, or documents relied upon by Secure Computing's experts as permitted by FRE 705.

Finjan objects to the admissibility of document excerpts or the admissibility of pages from documents that have been improperly redacted. Finjan reserves the right to offer additional evidence pursuant to FRE 106.

Finjan objects to all documents that are inadmissible hearsay if offered by Secure Computing, but which may be admissible if offered by Finjan. Finjan reserves the right to offer into evidence trial exhibits that are hearsay if offered by Secure Computing but that are admissible if offered by Finjan.

Finjan objects to the admissibility of alleged prior art that has been modified in any way. To the extent exhibits are offered as demonstratives, Finjan reserves all objections for such exhibits at the time objections to demonstrative exhibits are exchanged or submitted.

Finjan reserves its right to assert additional objections on the grounds of relevance, hearsay, and cumulativeness because Finjan is without any information at this time as to the purpose for which Secure Computing will seek to introduce documents on Secure Computing's Proposed Trial Exhibit List.

Finjan objects to the offering of documents that are excerpts of complete exhibits.

Finjan objects to offering a collection of separate documents as one exhibit, when some or all of the separate documents are inadmissible under FRE 105, 106, 403, 403, 802, 803, or 901.

Finjan reserves the right to use any document identified on Secure Computing's Proposed Trial Exhibit List.

Finjan maintains its objections under 901 until Secure Computing presents proper testimony to authenticate the exhibits.

Finjan objects to untranslated foreign language exhibits to the extent Secure Computing has not provided Finjan its translation of the same. Further, Finjan reserves all objections to untranslated foreign language exhibits.

Subject to and without waiving these general objections and reservations, Finjan submits the following objections. Finjan reserves the right to amend and/or supplement these objections.

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Schedule C(1)**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

Finjan Software, Ltd. v. Secure Computing Corp., et al.

CASE NO. 1:06-cv-369 GMS

Trial Date: March 3, 2008

**REFERENCE KEY FOR SECURE COMPUTING'S OBJECTIONS TO FINJAN'S
PROPOSED TRIAL EXHIBITS**

Rule	Basis for Objection
402	The evidence in the exhibit is not relevant and is not admissible.
403	Any relevance of the exhibit is substantially outweighed by the danger of unfair prejudice, confusion of the issues, misleading the jury, or considerations of unfair delay, waste of confusion of the issues, misleading the jury, or considerations of unfair delay, waste of time, or needless presentation of cumulative evidence.
408	Evidence of conduct or statements made in compromise negotiations is not admissible.
611	The exhibit is not effective for the ascertainment of the truth and avoids the needless consumption of time.
703	Facts or data that are otherwise inadmissible shall not be disclosed to the jury.
802	The exhibit contains or is hearsay and no exception applies.
805	The exhibit contains or is hearsay within hearsay and no exception applies.
901	Lack of authentication.
1002	The original is required to prove the content of a writing, recording, or photograph.
1006	Improper summary of evidence.
105	The exhibit may be admissible as to one party for one purpose, but is not admissible as to another party for another purpose.
106	Fairness requires admission of other exhibits and documents or the remainder of the document.

Schedule C(2)

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

Finjan Software, Ltd. v. Secure Computing Corp., et al.

CASE NO. 1:06-cv-369 GMS

Trial Date: March 3, 2008

**REFERENCE KEY FOR FINJAN'S OBJECTIONS TO SECURE COMPUTING'S
PROPOSED TRIAL EXHIBITS**

Abbreviation	Description of Objection
402	Not relevant
403	Probative value outweighed by prejudice, confusion, waste of time
704	Calls for legal conclusion
802	Hearsay not within any exception including Fed. R. Evid. 805 hearsay within hearsay
901	Lacks authentication
1006	Improper Summary
B	Best evidence Fed. R. Evid. 1001 and 1002
F	Lacks foundation Fed. R. Evid. 602, 901, 1002, 1003, 1005 and 1006
NP	Not produced during discovery although requested. Fed. R. Civ. P. 37(c)
P	Privilege (attorney-client communications or attorney work product)

EXHIBIT D

SCHEDULE D**Finjan's List of Potential Witnesses**

The following is the list of witnesses that Finjan Software Ltd. and Finjan Software, Inc. (collectively "Finjan") will call to testify at its case-in-chief, in person:

Witness Name and Title	Address	Secure Computing's Objections
Giovanni Vigna, Expert	Department of Computer Science University of California Santa Barbara, CA 93106-5110	<u>See</u> Motion in Limine To Preclude Finjan From Asserting Infringement Under the Doctrine of Equivalents. <u>See</u> Motion to Exclude Expert Testimony of Giovanni Vigna Regarding Alleged Infringement of Patent Claims Not Addressed in Vigna's Opening Expert Report. Secure Computing reserves all other objections to Giovanni Vigna's testimony for trial.
Matt Bishop, Expert	Department of Computer Science University of California, Davis One Shields Ave. Davis, CA 95616-8562	FRE 403; FRE 702; and Final Pretrial Order (Cumulative, Not Helpful to Jury; Prejudicial – <u>See</u> Motion in Limine To Exclude Cumulative Expert Testimony of Matthew Bishop and Todd Herberlein). Secure Computing reserves all other objections to Matt Bishop's testimony for trial.
Russell Parr, Expert	IPRA, Inc. 1004 Buckingham Way Yardley, PA 19067	Secure Computing reserves all objections to Russell Parr's testimony for trial.

Witness Name and Title	Address	Secure Computing's Objections
Todd Herberlein, Expert	39427 Spanish Bay Place Davis, CA 95616	FRE 403; FRE 702; and Final Pretrial Order (Cumulative, Not Helpful to Jury; Prejudicial – See Motion in Limine To Exclude Cumulative Expert Testimony of Matthew Bishop and Todd Herberlein). Secure Computing reserves all other objections to Todd Herberlein's testimony for trial.
Trent Jaeger, Expert	153 Brothers Court Port Matilda, PA 16870	Secure Computing reserves all objections to Trent Jaeger's testimony for trial.
Yuval Ben-Itzhak	Finjan Hamachshev St. 1, New Industrial Area Netanya, Israel 42504	Secure Computing reserves all objections to Yuval Ben- Itzhak's testimony for trial.

In addition, the following is the list of witnesses that Finjan may call to testify at their case-in-chief, in person or by deposition (transcript and/or videographic):

Witness Name and Title	Address	Secure Computing's Objections
Asher Polani, Director	Finjan Hamachshev St. 1, New Industrial Area Netanya, Israel 42504	Secure Computing reserves all objections to Asher Polani's testimony for trial.
Christoph Alme, Engineer	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn/Germany	Secure Computing reserves all objections to Finjan's examination of Christoph Alme for trial.

Witness Name and Title	Address	Secure Computing's Objections
(Cont.) Christoph Alme, Engineer		Secure Computing reserves all of its objections to Finjan's deposition designations of Christoph Alme's deposition.
Dan Frommer, Former VP Products	Address unknown	Secure Computing reserves all objections to Dan Frommer's testimony for trial.
David Kroll, Inventor	Address unknown	Secure Computing reserves all objections to David Kroll's testimony for trial.
Elizabeth Lally, Director of Legal Affairs	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Secure Computing reserves all objections to Finjan's examination of Elizabeth Lally for trial.
Ezra Softer, CFO	Finjan Chrysler Building, 405 Lexington Avenue, 35th Floor New York, NY 10174	Secure Computing reserves all objections to Ezra Sofer's testimony for trial.
Frank Berzau, Technical Evangelist	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn/Germany	Secure Computing reserves all objections to Finjan's examination of Frank Berzau for trial. Secure Computing reserves all of its objections to Finjan's deposition designations of Frank Berzau's deposition.

Witness Name and Title	Address	Secure Computing's Objections
Jan Schnellbacher, Engineer	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn/Germany	Secure Computing reserves all objections to Finjan's examination of Jan Schnellbacher for trial. Secure Computing reserves all of its objections to Finjan's deposition designations of Jan Schnellbacher's deposition.
Jill Putnam, Finance	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Secure Computing reserves all objections to Finjan's examination of Jill Putman at trial. Secure Computing reserves all of its objections to Finjan's deposition designations of Jill Putman's deposition.
John Vigourouz, CEO	Finjan 2025 Gateway Place, Suite 180 San Jose, CA 95110	Secure Computing objects to Finjan calling Mr. Vigourouz. Mr. Vigourouz was not disclosed to Secure Computing during discovery and Secure Computing had no opportunity to take Mr. Vigourouz's deposition. <u>See Fed. R. Civ. P. 26(a).</u>

Witness Name and Title	Address	Secure Computing's Objections
Limor Elbaz, VP Business Development	Finjan Chrysler Building, 405 Lexington Avenue, 35th Floor, New York, NY 10174	Secure Computing reserves all objections to Limor Elbaz's testimony for trial.
Martin Stecher, VP	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn/Germany	Secure Computing reserves all objections to Finjan's examination of Martin Stecher for trial. Secure Computing reserves all of its objections to Finjan's deposition designations of Martin Stecher's deposition.
Michael Gallagher, VP	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Secure Computing reserves all objections to Finjan's examination of Michael Gallagher for trial.
Nimrod Vered, Inventor	Moshav Mishemeret Israel, 40695	Secure Computing reserves all objections to Nimrod Vered's testimony for trial.
Paula Greve, Inventor	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Secure Computing reserves all objections to Finjan's examination of Ms. Greve at trial.
Peter Borgolte, Engineer	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn/Germany	Secure Computing reserves all objections to Finjan's examination of Mr. Borgolte at trial.

Witness Name and Title	Address	Secure Computing's Objections
(Cont.) Peter Borgolte, Engineer		Secure Computing reserves all of its objections to Finjan's deposition designations of Mr. Borgolte's deposition.
Roland Scholz, Engineer	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn/Germany	Secure Computing reserves all objections to Finjan's examination of Roland Scholz at trial.
Ron Kraistman, VP Finance	Finjan Hamachshev St. 1, New Industrial Area Netanya, Israel 42504	Secure Computing reserves all objections to Ron Kraitsman's testimony for trial.
Shlomo Touboul, Inventor	Kefar-Haim, Israel	Secure Computing reserves all objections to Shlomo Touboul's testimony for trial.
Steven Chew, Inventor	Secure Computing Corporation 135 Woodland Drive Pittsburgh, PA 15228	Secure Computing reserves all objections to Finjan's examination of Mr. Chew at trial. Secure Computing reserves all of its objections to Finjan's deposition designations of Mr. Chew's deposition.
Yigal Edery, Inventor	Address unknown	Secure Computing reserves all objections to Yigal Edery's testimony for trial.

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SCHEDULE D**Secure Computing's List of Potential Witnesses**

The following is the list of witnesses that Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG ("Secure Computing") will call to testify at its case-in-chief, in person or by deposition (transcript and/or videographic)::

Witness Name and Title	Address	Finjan's Objections
Michael Gallagher, Senior VP of Product Development and Support	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Finjan reserves all objections to Michael Gallagher's testimony for trial.
Martin Stecher, VP of Product Development, Webwasher	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn, Germany	Finjan reserves all objections to Martin Stecher's testimony for trial.
Christoph Alme, Principal Engineer and Team Lead	Secure Computing Corporation Vattmannstrasse 3 D-33100 Paderborn, Germany	Finjan reserves all objections to Christoph Alme's testimony for trial.
Shlomo Touboul, alleged inventor, and former CEO and Founder of Finjan	Yoggie Security Systems Ltd. Beit Halevy, Israel 42870	Finjan reserves all objections to Mr. Touboul's testimony for trial. Finjan reserves all objections to Secure Computing's deposition designation of Mr. Touboul's deposition.
David Kroll, alleged inventor	Address unknown	Finjan reserves all objections to Secure Computing's deposition designations of Mr. Kroll's deposition.
Yigal Edery, alleged inventor	Address unknown	Finjan reserves all objections to Secure Computing's deposition designation of Mr. Edery's

		deposition.
Nimrod Vered, alleged inventor	Address unknown	Finjan reserves all objections to Secure Computing's deposition designation of Mr. Vered's deposition.
Yuval Ben-Itzhak, CTO	Finjan Hamachshev St. 1, New Industrial Area Netanya, Israel 42504	Finjan reserves all objections to Secure Computing's examination of Mr. Ben-Itzhak at trial. In the event that Secure Computing makes deposition designation of Mr. Ben-Itzhak's deposition, Finjan reserves all objections to such designation.
Asher Polani, former CEO of Finjan	Address unknown	Finjan reserves all objections to Secure Computing's deposition designation of Mr. Polani's deposition.
Professor Dan Wallach, Expert	1435 Kentfield Avenue Redwood City, CA 94061	See Finjan's Motion in Limine to exclude testimony of Dan Wallach's Invalidity Opinion Regarding Finjan's Three Patents in Suit. See Finjan's Motion in Limine to exclude Expert Opinion and Testimony of Dan Wallach Regarding Alleged Infringement of Secure Computing Patents. Finjan reserves all other objections to Dan Wallach's testimony for trial.
Carl Degen, Expert	Christensen Associates 4610 University Avenue, Ste. 700	See Finjan's Motion in Limine to Exclude Expert Opinion and Testimony of Carl G. Degen Relating to

	Madison, WI 53705	Infringement of Finjan's Patents. Finjan reserves all other objections to Carl Degen's testimony for trial.
Limor Elbaz, VP, Business Development	Finjan New York, NY	Finjan reserves all objections to Secure Computing's examination of Ms. Elbaz at trial. Finjan reserves all objections to Secure Computing's deposition designation of Ms. Elbaz's deposition.

In addition, the following is the list of witnesses that Secure Computing may call to testify at its case-in-chief, in person or by deposition (transcript and/or videographic):

Witness and Title	Address	Finjan's Objections
Dan Frommer, former VP of Products at Finjan	Address unknown	Finjan reserves all objections to Secure Computing's deposition designation of Mr. Frommer's deposition.
Paula Greve, Co-Inventor of Secure Computing's Patent-in-suit 6,357,010	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Finjan reserves all objections to Paula Greve's testimony for trial.
Steve Chew, Co-Inventor of Secure Computing's Patent-in-suit 7,185,361	Secure Computing Corporation 135 Woodland Drive Pittsburgh, PA 15228	Finjan reserves all objections to Steve Chewr's testimony for trial.
Sarah Kaye, Documentation Manager	Finjan Software, Ltd. Hamachshev St. 1, New Industrial Area Netanya, Israel 42504	Finjan reserves all objections to Secure Computing's examination of Ms. Kaye at trial. Finjan reserves all objections to Secure

		Computing's deposition designation of Ms. Kaye's deposition.
Matt Galligan, VP Federal Sales	Secure Computing Corporation 12010 Sunset Hills Rd. Suite 300 Reston, VA 20190	Finjan objects to Secure Computing calling Mr. Galligan. Mr. Galligan was not disclosed to Finjan during discovery and Finjan had no opportunity to take Mr. Galligan's deposition. <u>See</u> Fed. R. Civ. P. 26(a).
Jill Putman, VP of Finance	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Finjan reserves all objections to Jill Putman's testimony for trial.
Rick Kruse, VP Firewall Development	Secure Computing Corporation 2340 Energy Park Drive St. Paul, MN 55108	Finjan objects to Secure Computing calling Mr. Kruse. Mr. Kruse was not disclosed to Finjan during discovery and Finjan had no opportunity to take Mr. Kruse's deposition. <u>See</u> Fed. R. Civ. P. 26(a).
Ezra Sofer, CFO	Finjan New York, NY	Finjan reserves all objections to Secure Computing's examination of Mr. Sofer at trial. Finjan reserves all objections to Secure Computing's deposition designation of Mr. Sofer's deposition.

Reservations:

Secure Computing may seek to exclude certain evidence as inadmissible under the Federal Rules of Evidence consistent with the Court's Final Pretrial Order, or other pretrial and trial proceedings. The Court's rulings may render the need for testimony on certain witnesses identified unnecessary. Secure Computing reserves the right to call individuals listed on Finjan's Witness List, rebuttal witnesses, witnesses needed for impeachment or foundation and witnesses

identified in response to Finjan's identification of witnesses or in response to developments at trial. Secure Computing also reserves the right to add additional deposition designations in the event that any of the individuals listed above as witnesses that Secure Computing intends to call or may call later become unable to attend the trial or are otherwise unable to provide live testimony.

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EXHIBIT E

SCHEDULE E

Finjan's Statement of Expert Witness Qualifications

Finjan Software Ltd. and Finjan Software, Inc. (collectively "Finjan") intend to call the following expert witnesses at trial:

1. Giovanni Vigna

a. Statement of Qualifications

Giovanni Vigna has been an Associate Professor in the Department of Computer Science at the University of California in Santa Barbara since 2000. He received his M.S. cum laude and Ph.D. from Politecnico di Milano, Italy, in 1994 and 1998, respectively. From 1998 to 2000, Dr. Vigna was a post doctoral researcher at the Department of Computer Science at UCSB. His current research interests include web security, intrusion detection, vulnerability assessment, and the security of mobile code systems.

Dr. Vigna's recent research work focused on the design of frameworks for the modular development of both anomaly-based and misuse-based intrusion detection systems. In particular, he developed novel techniques for the characterization of malware and for the detection of attacks against web-based services and applications. He actively participated in evaluations of intrusion detection systems sponsored by the Defense Advanced Research Projects Agency ("DARPA"). He also edited a book on Security and Mobile Agents and authored another book on Intrusion Correlation. He has been the Program Chair of the International Symposium on Recent Advances in Intrusion Detection (RAID 2003). He is also known for organizing and running the world's largest inter-university international Capture the Flag hacking contest.

Dr. Vigna served on a number of program committees for international conferences. He is also a member of four editorial boards, namely, the Journal of Computer Security, the IEEE Security & Privacy Magazine, the Institute of Electrical and Electronics Engineers ("IEEE") Transactions on Dependable and Secure Computing, and the Association for Computing Machinery ("ACM") Transactions on Information and System Security.

Dr. Vigna is a member of several professional organizations including the ACM, the IEEE, the IEEE Computer Society, and the USENIX Association.

Dr. Vigna has made important contributions in the areas of web security, vulnerability testing, and malware detection, with papers appearing in various international journals and conference proceedings. Some details on his main research activities follow.

Detection of Web-based Attacks

Web-based systems are a composition of infrastructure components, such as web servers and databases, and of application-specific code, such as HTML-embedded scripts and server-side applications. While the infrastructure components are usually developed by experienced programmers with solid security skills, the application-specific code is often developed under strict time constraints by programmers with little security training. As a result, vulnerable web-applications are deployed and made available to the whole Internet, creating easily-exploitable entry points to entire networks.

Dr. Vigna's research in this area concentrated on the anomaly-based detection of web-based attack. The use of anomaly-based techniques is motivated by the custom, ad hoc nature of web applications, which makes learning-based anomaly detection systems a suitable method for warning the exploitation of novel vulnerabilities. Dr. Vigna developed a novel intrusion detection system that uses a number of different anomaly detection techniques to detect attacks against web servers and web-based applications. The system correlates the server-side programs referenced by client queries with the parameters contained in these queries. The application-specific characteristics of the parameters allow the system to perform focused analysis while reducing the number of false positives.

Dr. Vigna's system automatically derives the parameter profiles associated with web applications (e.g., length and structure of parameters) from the analyzed data. Therefore, it can be deployed in very different application environments without time-consuming tuning and configuring. The system developed by Dr. Vigna was successfully tested on real-world data collected at three Universities (UCSB, State University of Milan, and Technical University of

Vienna) as well as at Google.

Testing of Network-based Intrusion Detection Systems

Misuse-based intrusion detection systems rely on models of attack to identify intrusive behavior. Therefore, whether these systems can reliably detect attacks is fundamentally relies on the quality of the relevant models, often referred to as “signatures.” Unfortunately, writing good models/signatures is hard. Attacks that exploit a specific vulnerability may do so in completely different ways, and writing models that take into account all possible variations is a difficult task. For this reason, it would be beneficial to have testing tools that could evaluate the “goodness” of detection signatures.

Dr. Vigna developed a novel technique to test and evaluate misuse-detection models for network-based intrusion detection systems. The testing technique is based on a mechanism that generates a large number of variations of one exploit by applying mutant operators to an exploit template. These mutant exploits are then ran against a victim host protected by a network-based intrusion detection system. The results of testing the variations provide a quantitative basis for the evaluation of the quality of the corresponding detection model.

Dr. Vigna created a tool, named Sploit, that can generate mutants of network attacks. Using this tool, he was able to demonstrate that a number of the signatures used by the two major intrusion detection tools, namely Snort and ISS RealSecure, could be easily evaded.

Malware Detection

In the past five years, malicious software (“malware”) has evolved and diversified. Simple viruses that attach to existing programs and need user-activation have evolved into autonomous programs that can infect thousands of hosts and disrupt entire networks. In addition, other types of malicious software, such as spyware, Trojan horses, and kernel-level rootkits are becoming common items in the attacker's toolbox. Unfortunately, the explosion of malware has not been matched by a corresponding evolution in defense tools. Most malware detection tools are syntax-based and use relatively simple pattern matching techniques. These techniques can only recognize known malware, and, in addition, they can be easily fooled by

sophisticated obfuscation and polymorphic protection techniques.

Dr. Vigna's research on malware focuses on two main directions. The first research direction focuses on techniques to analyze malware that has been obfuscated to evade detection. The second direction focuses on detecting malware using a composition of static and dynamic analysis to derive malware-based characterizations. In particular, Dr. Vigna developed a tool to detect kernel-level rootkits, which are programs that modify the kernel of a compromised host to make an attacker invisible to intrusion detection systems. His technique operates on binary code and is able to determine if a program has rootkit-like behavior.

In addition, Dr. Vigna developed a novel approach that uses a composition of static and dynamic analyses to characterize spyware-like patterns. In particular, he worked on characterizing the patterns of spyware based on Internet Explorer's Browser Helper Object ("BHO") interface, which accounts for the vast majority of spyware. The technique creates a shell around the BHO that simulates the events that would normally be generated by the browser.

b. Subject Matter of Testimony

Dr. Vigna will testify on the issue of infringement, both literally and under the doctrine of equivalents. In particular, Dr. Vigna will testify that the Webwasher and Cyberguard TSP products have features that fall within the scope of the asserted claims in patents ending in 194, 780, and 822. Dr. Vigna testimony will include testimony on scientific and technical issues concerning the Webwasher and Cyberguard TSP products and the plain and ordinary meaning of certain claim terms. Dr. Vigna will respond to any testimony provided by Secure Computing's experts on those topics.

Dr. Vigna's testimony is set forth in greater detail in his expert report of November 21, 2007 and his deposition of December 19, 2007.

2. **Matt Bishop**

a. Statement of Qualifications

Dr. Bishop is currently a professor in the Department of Computer Science at the University of California, Davis. He is also one of the co-directors of the Computer Security Laboratory in the department. He received an A.B. degree in Astronomy and Applied Mathematics and a M.A. degree in Mathematics from the University of California, Berkeley in 1976 and 1978 respectively, and a M.S. and Ph.D in computer science from Purdue University in 1981 and 1984 respectively. His thesis topic focused on computer security.

During the last year of his graduate studies, Dr. Bishop worked at Megatest Corp. Shortly after getting obtaining his doctorate, Dr. Bishop became a Research Scientist at the Research Institute for Advanced Computer Science at NASA Ames Research Center, where he researched in the area of computer security and computer graphics. In 1987 he joined the faculty in the Department of Mathematics and Computer Science at Dartmouth College, and in 1993 began teaching at Davis.

Dr. Bishop has been working in the computer security field since the late 1970s. He has specialized in the study of computer systems and networks vulnerabilities (e.g. how to define, detect, and eliminate such vulnerabilities). He has investigated formal models of access control, particularly information flow in the Take-Grant Protection Model, and how to analyze software for vulnerabilities, especially a class of problems known as “time of check to time of use race conditions”. He has also worked on correlating notices of attacks produced by network-based intrusion detection systems to understand how many small attacks can combine to compromise a system.

Much of Dr. Bishop’s work has useful and immediate applications. For example, a formal model of electronic recordation provided input to the California Attorney General’s regulations controlling the use of electronic recordation in the state of California. His work in electronic voting, especially in analyzing electronic voting systems in Maryland (the RABA study in 2004) and California (working with Yolo County in 2003-2004 and 2006-2007) and the standards

controlling their certification led to his leadership role on the “red team” of the California Secretary of State’s Top-To-Bottom Review for all certified Californian electronic voting systems. This study provided technical information that the Secretary of State relied on to determine necessary changes to the systems before continuing their use.

In 1984, Dr. Bishop was invited to join the Internet Privacy and Security Research Group. This group developed standards for privacy-enhanced electronic mail and its supporting certificate-based infrastructure. As a member of the group, he also analyzed several Internet protocols for security, and his review of version 2 of the Network Time Protocol (NTP) suggested several changes to improve its resistance to attack, many of which appeared in the next version of the protocol. Dr. Bishop is also on several advisory boards, including the distinguished External Advisory Board of the TRUST (Team for Research in Ubiquitous Secure Technology) NSF Science and Technology Center, and the National Visiting Committee for the Oklahoma Center for Information Assurance and Forensics Education, a regional center funded by the NSF’s Advanced Technological Education program. He also sits on the Technical Advisory Boards of Fortify Software, Inc. and Cranium. He served on the California Secretary of State’s Voting Systems Technology Assessment Advisory Board and the California Attorney General’s Electronic Recording Delivery Act Advisory Committee. He is also the UC Davis institutional representative to the Institute of Information Infrastructure Protection and a member of the group’s Executive Committee. He has been on many conference program committees and chaired several conferences and workshops, notably several of the Computer Misuse and Anomaly Detection workshops that accelerated the development of intrusion detection systems in the 1990’s. Currently, he is the general chair of the 2008 New Security Paradigms Workshop. He is also on the editorial board of the *Journal of Computer Security*, one of the two top technical journals in the field of computer security, and the editorial board of the *IEEE Security and Privacy* magazine.

Dr. Bishop’s textbook *Computer Security: Art and Science* is widely used as a textbook in both graduate and advanced undergraduate classes. He has been active in computer security

education, giving the keynote address at the first Colloquium for Information Systems Security Education in 1997 and was awarded the CISSE Academic Award in 2006. He has presented tutorials at many professional conferences such as SANS and USENIX, and is a co-editor of the Education Department in the *IEEE Security and Privacy* magazine.

b. b. Subject Matter of Testimony

Dr. Bishop will testify on matters of basic networking, specifically on how web traffic flows through the Internet and how security technology such as firewalls and anti-virus tools work and affect this flow.

Dr. Bishop's testimony is set forth in greater detail in his expert report of November 21, 2007.

3. **Russell Parr**

a. Statement of Qualifications

Russell L. Parr is a consultant, author, lecturer and publisher specializing in intellectual property. He has practiced as an intellectual property valuation and royalty rate consulting professional for over 25 years. His clients include multinational corporations, universities, individual inventors, and United States government agencies. Some of the corporations and universities for which he has conducted valuations and royalty rate studies include AT&T, Baxter International, IBM, Rockwell International, Mott's, Mead-Johnson, Hewlett-Packard Corporation, Dr. Seuss, Princeton University, Carnegie Mellon University, Rutgers University, Edwards, LifeSciences, Inc. and Bayer. The work he has performed for these and other entities include valuations, infringement litigation testimony, and royalty rate analyses used in license negotiations.

For example, Mr. Parr provided royalty rate analyses to AT&T to calculate the rates at which it would charge for transferring patented technology to third parties. His royalty rate opinion for Baxter was used for patent licensing negotiations in the medical products industry. He provided royalty rate opinions to IBM and Rockwell International for negotiating licenses in the telecommunication industry. He provided Mott's with a royalty rate analyses for patent license negotiations in the beverage industry. Hewlett-Packard and Mead-Johnson hired him to provide strategic planning advice about intellectual property management. For Dr. Seuss, he provided the estate of Theodor Geisel with a copyright valuation opinion for use in estate tax filings. For Princeton, Rutgers, and Carnegie Mellon, he provided royalty rate analyses for patent license negotiations. Edwards and Bayer hired him to provide patent infringement litigation support, analysis and expert testimony.

In addition, Mr. Parr personally owns intellectual property and has engaged in successful negotiations for his personal assets.

Mr. Parr's education includes a Masters in Business Administration and a Bachelor of

Science in Electrical Engineering from Rutgers University. He has also been awarded the professional designations of Chartered Financial Analyst (CFA) from the CFA Institute and Accredited Senior Appraiser from the American Society of Appraisers, both of which required the successful completion of coursework, examinations, and work experience.

In addition to his consulting practice at IPRA, Inc., Mr. Parr published three books regarding royalty rates for licensing intellectual property. These books are sold worldwide and are also used by Mr. Parr's customers to reach intellectual valuations and license agreements. The titles of the books are *Royalty Rates for Pharmaceuticals & Biotechnology*, 6th Edition, *Royalty Rates for Technology*, 3rd Edition, and *Royalty Rates for Trademarks & Copyrights*, 3rd Edition.

Mr. Parr is the author or co-author of additional books on the valuation and management of intellectual property published by John Wiley & Sons, Inc. These books are entitled: *Royalty Rates for Licensing Intellectual Property*, *Intellectual Property – Licensing & Joint Venture Profit Strategies*, *Intellectual Property Infringement Damages*, *Investing in Intellectual Property*, *Technology Licensing*, *Investing in Intangible Assets*, and *Intellectual Property – Valuation, Exploitation & Infringement Damages*. Some of these books are translated into foreign languages including Italian, Japanese, Chinese, Russian and Korean.

In addition to his activities as a consultant, author and publisher, Mr. Parr has been a guest speaker regarding intellectual property matters at over forty professional conferences including some sponsored by the American Intellectual Property Law Association, Licensing Executives Society, and the World Intellectual Property Organization.

b. Subject Matter of Testimony

Russell Parr will testify on the issues of the damages that would be adequate to compensate Finjan for the infringement by Secure Computing Corporation ("Secure Computing"), CyberGuard Corporation ("CyberGuard"), and Webwasher AG ("Webwasher") (collectively referred to as "Defendants") of United States Patent No. 6,092,194 ("194 Patent"), United States Patent No. 6,804,780 ("780 Patent"), and United States Patent No.

7,058,822 (“822 Patent”) (collectively the “Finjan Patents”). Mr. Parr will also testify as to the damages set forth by the Defendants for Finjan’s alleged infringement of United States Patent Nos. 7,185,361 and 6,357,010. He will discuss damages measured by a theory of reasonable royalty. Mr. Parr’s testimony is set forth in greater detail in his expert reports of November 21 and December 12, 2007, as well as his deposition of December 17, 2007.

4. Todd Heberlein

a. Statement of Qualifications

Todd Heberlein is the President of Net Squared, Inc. based in Davis, California, and a post graduate researcher at UC Davis. At UC Davis, Mr. Heberlein received a B.S. degree in Computer Science and Math and a M.S. degree in Computer Science in 1988 and 1991, respectively. In addition to his coursework, Mr. Heberlein co-founded the UC Davis Computer Security Lab which, during his tenure, developed the first network-based intrusion detection system, the first integrated host and network based intrusion detection system, and the first intrusion detection system designed to support several thousand hosts.

Mr. Heberlein played a key role in several government-sponsored network security projects for agencies including the Air Force, the DARPA, and the Department of Energy. For example, Mr. Heberlein developed the original network sensor for the Air Force's Automated Security Incident Measurement global sensor grid. Mr. Heberlein was also the principal developer of the intelligence community Advanced Research Development Activity Environment Aware project, an effort to identify changes to a network that optimizes overall security. In addition, Mr. Heberlein served on a DARPA panel that created an information video on the threat to the nation's critical infrastructure and recently participated in a joint European Union and United States summit to coordinate cyber security research across the Atlantic Ocean.

Mr. Heberlein also authored numerous network security publications dating back as early as 1990. His publications have been noted with awards such as the distinction of best paper for "Attack Class: Address Spoofing" and "DIDS (Distributed Intrusion Detection System) – Motivation, Architecture, and an Early Prototype."

In 2005, Mr. Heberlein lent his technical expertise to the legal world by serving as an expert witness in a patent lawsuit between SRI and Symantec Corporation. The case centered around four intrusion detection patents and Mr. Heberlein's role as an expert witness spanned

from early 2005 to October of 2006.

b. Subject Matter of Testimony

Mr. Heberlein will testify with regard to the evolution of the World Wide Web and the rise in Internet-borne threats to businesses operating in today's marketplace; the historic and current approaches to network security issues and related trends; and the Webwasher product's current approach to network security (including the use of Finjan's patented technology) as a means of meeting consumer demand and keeping pace with market trends. He will also testify as to the validity of the Finjan Patents, including secondary considerations of non-obviousness. Mr. Heberlein's testimony is set forth in greater detail in his expert reports of November 21 and December 12, 2007, as well as his deposition of December 17, 2007.

5. Trent Jaeger

a. Statement of Qualifications

Dr. Trent Jaeger is an Associate Professor of Computer Science and Engineering and Co-Director of the Systems and Internet Infrastructure Security Lab at The Pennsylvania State University. Prior to this position, which he has held since 2005, Dr. Jaeger was a Research Staff Member at the IBM Thomas J. Watson Research Center, beginning in 1996. He earned M.S.E and Ph.D. degrees in Computer Science and Engineering from the University of Michigan, Ann Arbor in 1993 and 1997, respectively. Prior to that, Dr. Jaeger worked as a Systems Engineer for Electronic Data Systems starting in 1986. Dr. Jaeger holds an undergraduate degree in Chemical Engineering from the California State Polytechnic University, Pomona.

Dr. Jaeger has co-directed the Systems and Internet Infrastructure Security (SIIS) Lab since 2005. The SIIS Lab is one of the largest academic security research labs in the United States, with over twenty-five graduate students focusing on security research. Dr. Jaeger focuses his work on operating systems security, but his work also includes programming language security and network security. He has investigated mechanisms for ensuring the integrity of computing systems, the application of trusted computing hardware to measure the system integrity, virtual machine security architectures for distributed computing, the integration of security-typed language programs with operating systems security, security architectures for mobile phone systems, and policy models and analysis tools for verifying the enforcement of security goals. Dr. Jaeger's work in these areas began in 1994, and has continued since then.

Dr. Jaeger is also an active contributor to the Linux security community and the computer security community at large. His Linux work includes contributions to the Linux Security Modules framework, Security-enhanced Linux, and Labeled IPsec, which are all part of the current Linux operating system. He is an active member of the computer security research community, having participated in the organizing committees of all the major

computer security conferences. Dr. Jaeger serves as the associate editor for the ACM Transactions on Internet Technology, and has served on numerous review panels for the National Science Foundation and Natural Sciences and Engineering Research Council (Canada).

Dr. Jaeger is also the author of over sixty original publications in computer science research and is currently in the process of writing on a book on operating systems security to be published in 2008. Dr. Jaeger's research expertise spans a variety of areas in computer security ranging from operating systems security, security policy models and technologies, distributed systems security architectures, virtual machine security, the application of trusted computing hardware to security, and source code analysis for security. His research has been supported by a variety of agencies, both governmental, such as the National Science Foundation and the Intelligence Advanced Research Projects Activity, and several industrial sponsors.

b. Subject Matter of Testimony

Dr. Jaeger will testify that the asserted claims of the '361 patent, specifically Claims 1-5, 7-12, and 14-15, are anticipated and/or obvious in light of the prior art. He will also testify that the asserted claim of the '010 patent, specifically Claim 37, is anticipated and/or obvious in light of the prior art.

Dr. Jaeger will also testify on the issues of infringement. In particular, Dr. Jaeger will testify that Finjan's NG-1100, NG-5100, NG-6100, and NG-8100 products (hereafter collectively referred to as the "Finjan Security Products") do not infringe any asserted claims of the '361 patent, specifically Claims 1-5, 7-12, and 14-15, and that Finjan's Vital SecurityTM for Documents and Documents 1BoxTM products (hereafter collectively referred to as the "Finjan Document Products") do not infringe any asserted claims of the '010 patent, specifically Claim 37.

Dr. Jaeger's testimony is set forth in greater detail in his expert reports of November 21 and December 12, 2007, as well as his deposition of December 14, 2007.

SCHEDULE E

Secure Computing's Statement of Expert Witness Qualifications

Defendants-Counterclaimants, Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG ("Secure Computing"), propose the following as a statement of qualifications and subject matters of Secure Computing's expert witnesses Dan Wallach and Carl Degen, whom Secure Computing intends to call at trial, for purposes of section 2(e) of the Finjan Pretrial Order. A more detailed statement of Dr. Wallach's and Mr. Degen's qualifications and testimony are found in the expert reports served on Finjan and in the depositions taken by Finjan.

1. Professor Dan Wallach will testify on behalf of Secure Computing on the subjects of: (1) the validity of Secure Computing's patents; (2) Finjan's infringement of Secure Computing's patents; (3) non-infringement by Secure Computing of Finjan's patents; and (4) invalidity of Finjan's patents.

Professor Wallach is an Associate Professor in the Department of Computer Science at Rice University in Houston, Texas. He earned his doctorate degree at Princeton University in 1999 and his master of arts at Princeton in 1995. He earned his bachelor's of science degree in electrical engineering and computer science at the University of California, Berkeley in 1993. Professor Wallach's specialty is computer security.

After receiving his doctorate, Professor Wallach accepted the position of assistant professor at Rice University in the Department of Computer Science. He currently is an associate professor with tenure. While at Rice, the focus of Professor Wallach's research has been on a number of different topics in computer security, including mobile code security and the security of peer-to-peer networking systems.

Professor Wallach has served on a number of program committees for research conferences in computer security. He was also honored to serve as the program chair for the USENIX Security Symposium in 2001 and the track co-chair for the International World Wide Web Conference's Security and Privacy Track in 2007 and 2008.

2. Carl Degen will testify on behalf of Secure Computing on the subject of damages. Mr. Degen is the President of Christensen Associates, an economic research and consulting firm located in Madison, Wisconsin. Mr. Degen has been with Christensen Associates since 1980, and has been President of Christensen Associates since 2005. Mr. Degen received a bachelor of science degree, in Mathematics and Economics, from the University of Wisconsin-Parkside, a master's degree in economics from the University of Wisconsin-Madison.

EXHIBIT F

SCHEDULE F**Deposition Designations****PLAINTIFF'S DEPOSITION DESIGNATIONS**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
Christoph Alme testimony			
5:23; 6:8; 16:22-17:21; 36:20-39:3; 55:22-61:4; 62:1-12; 62:23-63:15; 64:8-65:5; 69:11-25; 82:22-83:5; 89:23-90:13; 93:3-94:9; 98:1-100:23; 105:15-23; 107:6-12; 109:6-110:20; 111:5-13; 114:8-116:11	98:1-100:23; FRE 402, 403 (lack of relevance, prejudice), Calls for Legal Conclusion/Claims Construction	19:1-5; 19:10-14; 19:16-21; 19:23-21:6; 39:4-12; 39:14-40:9; 40:11-12; 40:18-20; 63:16-18; 65:6-16; 111:14-16; 111:18-112:4; 112:23-113:14	No objections
Peter Borgolte testimony			
5:2-10; 12:3-19; 16:25-17:6; 18:19-19:2; 21:21-23:5	18:19-FRE 402, 403 (lack of relevance, prejudice), Lack of Foundation, Calls for Legal Conclusion/Claims Construction	13:8-20; 17:13-15	No objections
Jan Schnellbacher testimony			
4:11-25; 10:11-12:18; 18:6-25; 26:16-27:17	Object to all designations-FRE 402, 403 (Lack of Relevance, Prejudicial), Lack of Foundation, Calls for Legal Conclusion/Claims Construction		No objections

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
Steven Chew testimony			
4:10-21; 6:7-12; 8:2-9:16; 10:19-11:10; 11:18-16:1; 16:22-18:24; 22:12-23:5; 44:23-45:14; 60: 4-63:14; 64:5-68:13; 77:21-78:22	10:19-11:10; FRE 402, 403 (Lack of Relevance, Prejudicial) 11:18-16:1; FRE 402, 403 (Lack of Relevance, Prejudicial) 16:22-18:24; FRE 402, 403 (Lack of Relevance, Prejudicial) 22:12-23:5; FRE 402, 403 (Lack of Relevance, Prejudicial) 60: 4-63:14; FRE 402, 403 (Lack of Relevance, Prejudicial) 64:5-68:13; FRE 402, 403 (Lack of Relevance, Prejudicial, Legal Conclusion) 77:21-78:22; FRE 402, 403 (Lack of Relevance, Prejudicial, Legal Conclusion)	16:2-14; 77:9-12; 77:15-20; 79:17-24; 80:1-6; 80:9-10	79:17-22; F 79:23-24, 80:1-6, 80:9-10; 402
Frank Berzau testimony			

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
5:1-9; 8:13-10:18; 13:19-14:10; 15:22-16:3; 21:21-22:25; 23:24-24:2; 25:20-28:9; 34:1-35:11; 37:17-39:18	8:16-23; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous 8:24-9:3; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous 9:4-10; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous 9:11-18; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous 9:19-23; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous 9:24-10:1; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous 14:6-10; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous	8:6-12; 13:5-6; 13:8-18; 23:8-16; 24:3-6; 24:10-20; 33:10-13; 36:22-24; 37:7-9; 43:18-20	No objections

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
	<p>15:22-16:3; FRE 403 (Prejudicial); Lack of Foundation; Vague/Ambiguous</p> <p>23:24-24:2; Lack of Foundation; Calls for Speculation</p> <p>26:15-27:4; Lack of Foundation; Calls for Speculation</p> <p>35:3-5; Lack of Foundation; Calls for Speculation</p> <p>35:6-11; FRE 403 (Prejudicial); Lack of Foundation</p> <p>37:25-38:16; FRE 802 (Hearsay); Ambiguous and mistranslated-see objection on the record at 38:11-16</p>		
Jill Putnam testimony			
<p>4:8-15; 23:6-12; 43:19-44:5; 46:12-47:8; 49:8-22; 50:15-51:7; 54:15-55:22; 71:21-74:22; 83:20-84:10; 86:7-17;</p>	<p>General Objection-Secure Computing objects to Finjan's designations to the extent they are beyond scope of Finjan</p>	<p>4:1-4; 19:4-19; 20:3-16; 20:22-23; 21:10-25; 22:15-23:1; 42:13-43:18; 51:11-</p>	<p>101:12-13, 101:15; F</p>

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
89:8-92:21; 97:2-20; 98:21-99:12; 100:15-21; 101:24-102:7; 103:22- 104:2; 104:18-24; 105:18-107:1; 116:3- 12;	Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602), and specifically questions relating to "sales" as Finjan purports to interpret that term for this deposition. 4:8-15; FRE 402, 403 (Lack of Relevance, Prejudicial, and privacy, to the extent the answer reveals Ms. Putman's home address) 46:12-47:8-Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation 49:8-22; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the	12; 51:15-16; 51:19-21; 68:15-25; 69:5-15; 71:17- 20; 79:9-11; 79:16-18; 80:8-21; 84:12-14; 84:16- 18; 84:23-85:7; 86:19-87:3; 88:23-89:7; 101:12-13; 101:15; 101:17-18; 101:20- 22; 102:9-103:9; 115:7-25;	

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
	<p>witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>50:15-51:7; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>54:15-55:22; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>72:21-73:23; FRE 611 (Leading); Improper Characterization; FRE 403 (Prejudicial)</p> <p>73:24-74:9-FRE 611 (Leading); Improper Characterization; FRE</p>		

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
	<p>403 (Prejudicial)</p> <p>74:10-22; FRE 611 (Leading); Improper Characterization; FRE 403 (Prejudicial); Lack of Foundation; Calls for Speculation</p> <p>83:20-84:10; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>86:7-17; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>89:8-92:21; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing</p>		

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
	<p>witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>97:2-20; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>98:21-99:12; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>100:15-21; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602);</p>		

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
	<p>Lack of Foundation; Calls for Speculation</p> <p>101:24-102:7; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>103:22-104:2; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p> <p>104:18-24; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation</p>		

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
	116:3-12; Beyond scope of Finjan Rule 30(b)(6) notice and Secure Computing witness designation and the witness' personal knowledge (FRE 602); Lack of Foundation; Calls for Speculation		
Martin Stecher testimony			
7:6-14; 22:5-23:4; 24:5-27:18; 28:1-29:19; 30:5-32:9; 34:4-36:24; 46:20-52:7; 55:22-56:9; 57:6-61:2; 61:25-62:8; 62:22-68:4; 69:7-22; 70:16-71:16; 72:11-73:1; 74:12-75:3; 75:13-76:20; 77:25-81:6; 81:20-83:6; 84:24-86:10; 87:8-88:6; 89:12-90:11; 91:1-20; 92:19-93:4; 94:16-95:14; 99:21-100:1; 101:1-17; 103:9-105:20; 117:8-119:20; 121:21-122:22; 128:9-129:7; 132:12-18; 135:3-136:16; 137:3-18; 155:9-20; 156:20-158:17; 163:3-165:6; 167:18-173:9; 176:6-177:21; 181:6-182:25;	72:11-73:1; Ambiguous and mistranslated-see objection on the record at 73:2-11 75:13-76:20; FRE 402 and 403 (Lack of Relevance, Prejudicial, colloquy/speech by counsel; see objection and counsel's response at 75: 23-76:1) 117: 8-119:20; FRE 402 and 403 (Lack of Relevance and Prejudicial-119:1-20) 128:9-129:7; FRE 402, 403 (Lack of Relevance,	19:18-21:25; 29:20-30:4; 33:12-17; 34:2-3; 37:17-39:17; 52:16-53:1; 54:6-21; 62:9-19; 101:20-103:8; 122:23-123:8; 127:19-128:8; 136:22-137:2; 212:21-213:19; 219:25-220:6;	33:12-17; 106 52:16-53:1; 106 119:25-220:6; 402

SCHEDULE F**Deposition Designations**

Finjan's Designations	Secure's Objections	Secure's Counterdesignations	Finjan's Objections to Counterdesignations
184:17-186:9; 187:16-25; 188:19-195:5; 196:4-25; 206:13-212:20; 213:25-215:14; 216:2-219:3; 220:7-222:6; 223:22-225:14; 233:18-234:3	Prejudicial 137:3-18; FRE 402, 403 (Lack of Relevance, Prejudicial) 184:17-186:9; FRE 402, 403 (Lack of Relevance); Lack of Foundation		

SCHEDULE F**Deposition Designations****DEFENDANTS DEPOSITION DESIGNATIONS**

Secure Computing's Designations	Finjan's Objections¹	Finjan's Counterdesignations	Secure's Objections to Counterdesignations
Sarah Kaye testimony			
4:22-25; 5:3-7; 14:11-20; 17:6-16; 76:21-78:3; 78:18-19; 78:22-24; 79:7-19; 79:21-80:5; 80:12-13; 80:22-81:2	77:9-24; 402, 403 78:18-19, 22-24; 402 79:7-19, 79:21-80:5; F, 402, 802, 403 80:12-13, 80:22-81:2; F, 402, 403	11:2-9; 17:17-18:1; 78:4-17; 78:20-21; 78:25-79:6; 80:6- 11; 81:3-10	78:25-79:6; FRE 402 and 403 (Lack of Relevance, Prejudicial, colloquy/speech by counsel)
Limor Elbaz testimony			
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¹ Finjan sets forth its objections to Defendants' deposition designations and counterdesignations by abbreviation. A key to the abbreviations can be found attached hereto at Schedule F(1).

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SCHEDULE F

Deposition Designations

RESERVATIONS AND NOTATIONS

- The parties reserve the right to amend and/or supplement these designations, counterdesignations and objections.
- The parties' Counterdesignations are made subject to objections to the original designation. If an objection to the original designation is withdrawn, the parties reserve the right to withdraw the counterdesignation. If an objection is sustained, the parties reserve the right to withdraw the counterdesignation.
- The parties objections to exhibits mentioned in a designation will be made separately as part of the objections to exhibits.
- Secure Computing objects to the reading of any attorney colloquy or objections.
- Secure Computing reserves the right to designate deposition testimony of Yuval Ben-Itzhak if Mr. Ben-Itzhak is taken off Finjan's "will call" witness list.
- Secure Computing objects to the offering of any testimony by deposition of a witness who is available to testify live at trial.
- Secure Computing proposes that where the interpreter has accepted a correction of the translation, the original translation and objection should not be read, but only the corrected translation.

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EXHIBIT G

SCHEDULE G

**Finjan's and Secure Computing's Statement
Regarding Settlement Discussions**

Plaintiff-Counterdefendant Finjan Software, Ltd. and Counterdefendant Finjan Software, Inc. (collectively "Finjan"), and Defendants-Counterclaimants, Secure Computing Corporation, Cyberguard Corporation, and Webwasher AG ("Secure Computing"), submit the following statement summarizing the history and status of settlement negotiations between the parties, for purposes of section 2(j) of the Finjan Pretrial Order:

On October 25, 2007, the parties participated in a mediation conference with The Honorable Magistrate Judge Mary Pat Thyng. The mediation did not result in settlement of any claims. The mediation was the first time the parties had a substantive discussion regarding settlement. The CEO's of Secure Computing and Finjan have continued to discuss settlement directly with each other since the October 25th mediation.

EXHIBIT H

SCHEDULE H

List of *Motions in Limine*

1. Finjan's Motion *in Limine* No. 1 to Exclude Testimony of Dan Wallach's Invalidity Opinion Regarding Finjan's Three Patents in Suit
 - a. Finjan's Motion In Limine (D.I. 147) and Affidavit of Meghan Ashley Wharton (D.I. 148)
 - b. Secure Computing's Opposition (D.I. 159)
 - c. Finjan's Reply (D.I. 162)
2. Finjan's Motion *in Limine* No. 2 to Exclude Expert Opinion and Testimony of Dan Wallach Regarding Alleged Infringement of Secure Computing's Patents
 - a. Finjan's Motion In Limine (D.I. 149) and Affidavit of Meghan Ashley Wharton (D.I. 150)
 - b. Secure Computing's Opposition (D.I. 160)
 - c. Finjan's Reply (D.I. 163)
3. Finjan's Motion *in Limine* No. 3 to Exclude Expert Opinion and Testimony of Carl G. Degen Relating to Infringement of Finjan's Patents
 - a. Finjan's Motion In Limine (D.I. 151) and Affidavit of Meghan Ashley Wharton (D.I. 152)
 - b. Secure Computing's Opposition (D.I. 161)
 - c. Finjan's Reply (D.I. 164)
4. Secure Computing Corporation's Motion to Exclude Cumulative Expert Testimony of Matthew Bishop and Todd Heberlein
 - a. Secure Computing's Motion In Limine (D.I. 154)
 - b. Finjan's Opposition (D.I. 158)
 - c. Secure Computing's Reply (D.I. 167)

5. Secure Computing Corporation's Motion to Exclude Expert Testimony of Giovanni Vigna Regarding Alleged Infringement of Patent Claims Not Addressed in Vigna's Opening Expert Report
 - a. Secure Computing's Motion In Limine (D.I. 153)
 - b. Finjan's Opposition (D.I. 157)
 - c. Secure Computing's Reply (D.I. 166)
6. Secure Computing Corporation's Motion to Preclude Finjan From Asserting Infringement Under the Doctrine of Equivalents
 - a. Secure Computing's Motion In Limine (D.I. 155)
 - b. Finjan's Opposition (D.I. 156)
 - c. Secure Computing's Reply (D.I. 165)